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Divide Travel Plan

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Helena Ranger District, Helena National Forest
Powell and Lewis and Clark Counties, Montana

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Glossary and Acronyms

This section contains a glossary, followed by a list of acronyms that are commonly used by the agency and can be found throughout this document.

Glossary

Access	See public access.
Affected Environment	The biological and physical environment that will or may be changed by actions proposed and the relationship of people to that environment.
Alternative	One of several policies, plans, or projects proposed for decision making.
Anadromous Fish	Fish which spend much of their adult life in the ocean, returning to inland waters to spawn; e.g., salmon, steelhead.
Aquatic Ecosystem	A stream channel, lake, or estuary bed, the water itself, and the biotic communities that occur therein.
Arterial Road	A NFS road that provides service to large land areas and usually connects with other arterial roads or public highways. These roads are generally maintenance level 4 or 5.
Best Management Practices (BMPs)	The set of standards in the Forest Plan which, when applied during implementation of a project, ensures that water related beneficial uses are protected and that State water quality standards are met. BMPs can take several forms. Some are defined by State regulation or memoranda of understanding between the Forest Service and the States. Others are defined by the Forest interdisciplinary planning team for application Forestwide. Both of these kinds of BMPs are included in the Forest Plan as forestwide standards. A third kind is identified by the interdisciplinary team for application to specific management areas. A fourth kind, project level BMPs, is based on site specific evaluation, and represents the most effective and practicable means of accomplishing the water quality and other goals of the specific evaluation, and represents the most effective and practicable means of accomplishing the water quality and other goals of the specific area involved in the project. These project level BMPs can either supplement or replace the Forest Plan standards for specific projects.
Big Game	Those species of large mammals normally managed as a sport hunting resource.
Big Game Summer Range	Land used by big game during the summer months.
Big Game Winter Range	The area available to and used by big game through the winter season.
Biological Evaluation	An assessment required by the Endangered Species Act of 1973 to identify any threatened, endangered, or sensitive species which is likely to be affected by a proposed management action, and to evaluate the potential

	effects of the proposed action on the species or their habitats.
Capability	The potential of an area of land and/or water to produce resources, supply goods and services, and allow resource uses under a specified set of management practices and at a given level of management intensity. Capability depends upon current conditions and site conditions such as climate, slope, landform, practices such as silviculture, or protection from fires, insects, and disease.
Cavity	A hollow in a tree which is used by birds or mammals for roosting and reproduction.
Closed Roads	Roads developed and operated for limited use. Public vehicular traffic is restricted except when they are operating under a permit or contract or in an emergency.
Closure	The administrative order that does not allow specified uses in designated areas or on Forest development roads or trails.
Designated Route	A National Forest System (NFS) road, a NFS trail, or an area on NFS lands that is designated for motor vehicle use pursuant to 36 CFR §212.51 on a motor vehicle use map (36 CFR 212.1). A designation for a road or trail includes all terminal facilities, trailheads, parking lots, and turnouts associated with the designated road or trail. The designation also includes parking within one vehicle width from the edge of the road surface when it is safe to do so.
Developed Recreation	Recreation that occurs where improvements enhance recreation opportunities and accommodate intensive recreation activities in a defined area.
Direct Effects	Effects on the environment which occur at the same time and place as the initial cause or action.
Dispersed Recreation	That portion of outdoor recreation use which occurs outside of developed sites in the unroaded and roaded Forest environment; i.e., hunting, backpacking, and berry picking.
Disturbance	Any management activity that has the potential to accelerate erosion or mass movement; also any other activity that may tend to disrupt the normal movement or habits of a particular wildlife species. At the landscape scale, a disturbance would be a force, such as wildfire, disease, or large scale vegetation management, which can significantly alter existing ecosystem conditions.
Draft Environmental Impact Statement; Draft EIS	Draft Environmental Impact Statement. A detailed written statement as required by Section 102(2)(C) of the National Environmental Policy Act.
Effects (or Impacts)	Physical, biological, social, and economic results (expected or experienced) resulting from natural events or management activities. Effects can be direct, indirect, and/or cumulative.

Endemic	Term applied to populations of potentially injurious plants, animals, or viruses that are at their normal, balanced, level, in an ecosystem in contrast to epidemic levels. Plant and animal diseases which are prevalent in or peculiar to a certain locality.
Elk Hiding Cover	Vegetation, primarily trees, capable of hiding 90 percent of an elk seen from a distance of 200 feet or less.
Elk Security Area	An area elk retreat to for safety when disturbance in their usual range is intensified, such as by logging activities or during the hunting season. To qualify as a security area, there must be at least 250 contiguous acres that are more than 1/2 mile from open roads.
Endangered Species	Any species which is in danger of extinction throughout all or a significant portion of its range, and listed as such by the Secretary of the Interior in accordance with the Endangered Species Act of 1973.
Ephemeral	A depression in the topography that carries surface water during peak rainfall events.
Erosion	The wearing away of the lands' surface by water, wind, ice, or other physical processes. It includes detachment, transport, and deposition of soil or rock fragments.
Essential Habitat	Areas with essentially the same characteristics as critical habitat but not declared as such. These habitats are necessary to meet recovery objectives for endangered, threatened, and proposed species.
Final Environmental Impact Statement (FEIS)	Final Environmental Impact Statement. The final version of the public document required by the National Environmental Policy Act (see Draft Environmental Impact Statement).
Floodplain	Low land and relatively flat areas joining streams, rivers, and lakes which are periodically inundated by overbank flows of water.
Forage	All browse and non-woody plants available to livestock or wildlife for feed.
Geographic Information System (GIS)	Geographic Information System. A computer program for manipulating landscape configuration data.
Habitat	A place where a plant or animal naturally or normally lives and grows.
Habitat Effectiveness	The measure of how open roads affect utilization of habitat by elk.
Habitat Type	An aggregation of all land areas potentially capable of producing similar plant communities at climax.
Hiding Cover	Trees of sufficient size and density to conceal animals from view at 200 feet. See Cover.
Highway Legal Vehicles	Any motor vehicle that is licensed or certified under state law for general operation on all public roads in the State (FSM 7705). Montana State Law mandates the following regulations for off-highway vehicle (OHV) use on all National Forest Roads: The OHV must be registered as a motor vehicle at the County Treasurers

	office (a vehicle title is required; a license plate will be issued). The operator of the vehicle must possess a valid driver's license and a motorcycle/OHV endorsement on their Montana Driver's License. Operators of these vehicles must be in compliance with all applicable laws. The vehicle must have a mirror, horn, headlights, and brake lights. A safety helmet is required for anyone under 18 years of age, either a driver or passenger, and is highly recommended for all OHV riders.
Hydrologic Recovery	The process of re-vegetation of a disturbed area which returns the site to pre-disturbance levels of water runoff and timing of flow.
Indicator Species	Species identified in a planning process that are used to monitor the effects of planned management activities on viable populations of wildlife and fish, including those that are socially or economically important. See Management Indicator Species.
Indigenous	Having originated in and being produced, growing, living, or occurring naturally in a particular region or environment.
Indirect Effects	Indirect effects are caused by the action and occur later in time or further removed in distance, but are still reasonably foreseeable.
Interdisciplinary Team (IDT)	Interdisciplinary Team. A group of individuals with different training assembled to solve a problem or perform a task. The team is assembled out of recognition that no one scientific discipline is sufficiently broad to adequately solve the problem. Through interaction, participants bring different points of view to bear on the problem.
Invasive Species	Any non-native plant, which when established are or may become destructive and difficult to control by ordinary means of cultivation or other control practices such as spotted knapweed and yellow star thistle
Inventoried Roadless Area (IRA)	An area which is larger than 5,000 acres, or if smaller than 5,000 acres, contiguous to a designated wilderness or primitive area; meets the minimum criteria for wilderness consideration under the Wilderness Act; and has been inventoried for possible inclusion to the wilderness preservation system
Inventory Data	Recorded measurements, facts, evidence, or observations of forest resources such as soil, water, timber, wildlife, range, geology, minerals, and recreation, which is used to determine the capability and opportunity of the forest to be managed for those resources.
Irretrievable	Foregone or lost production, harvest, or use of renewable natural resources. For example, when fire destroys a tree plantation, the effect is irretrievable but the loss of site productivity as measured by the presence of trees is not irreversible.
Irreversible	The removal of resources such that they cannot be produced gain. This applies most commonly to nonrenewable resources such as minerals or cultural resources, or to resources such as soil productivity that are

	renewable only over long periods of time. Loss of renewable resources can also be irreversible as in the replacement of a forest with a road.
Landtype; Landtype Association (LTA)	Landtype Association. An area of land classified on the basis of geomorphic attributes. An understanding of geologic processes, as reflected in land surface form and features, individual kinds of soil, and the factors which determine the behavior of ecosystems (i.e., climate, vegetation, relief, parent materials, and time) is used as the basis for this classification system.
Local Road	A NFS road that connects a terminal facility with collector roads, arterial roads, or public highways and that usually serves a single purpose involving intermittent use. These roads are usually maintenance level 1 or 2.
Long Term Effects	Those effects which generally occur after the maximum 15 year life of the Forest Plan.
Maintenance Level	Maintenance levels define the level of service provided by, and maintenance required for, a specific road.
Management Area	An aggregation of capability areas which have common management direction and may be noncontiguous in the forest. Consists of a grouping of capability areas selected through evaluation procedures and used to locate decisions and resolve issues and concerns.
Management Practice	A technique or procedure commonly applied to forest resources, resulting in measurable outputs or activities.
Management Prescription	Management practices and intensities selected and scheduled for application on a specific area to attain multiple use and other goals and objectives.
Mitigation	Avoiding or minimizing impacts by limiting the degree or magnitude of the action and its implementation; rectifying the impact by repairing, rehabilitating, or restoring the affected environment; reducing or eliminating the impact by preservation and maintenance operations during the life of the action.
Management Direction	A statement of multiple use and other goals and objectives, the associated management prescriptions and the associated standards and guidelines for attaining them.
Management Indicator Species	A plant or animal which, by its presence in a certain location or situation, is believed to indicate the habitat conditions for many other species.
Model	A theoretical projection in detail of a possible system of natural resource relationships. A simulation based on an empirical calculation to set potential or outputs of a proposed action or actions.
Monitoring	An examination, on a sample basis of Forest Plan management practices, to determine how well objectives have been met and a determination of

	the effects of those management practices on the land and environment.
Motorcycles	All two-wheeled motorized vehicles, including motorcycles and trail cycles. A two-wheeled motor vehicle on which the wheels are situated in a line rather that side by side (FSH 2309.18.05).
National Environmental Policy Act (NEPA)	National Environmental Policy Act. An act to declare a national policy that will encourage productive and enjoyable harmony between man and his environment, to promote efforts that will prevent or eliminate damage to the environment and biosphere, and stimulate the health and welfare of man, to enrich the understanding of the ecological systems and natural resources important to the nation, and to establish a Council on Environmental Quality. An interdisciplinary process, mandated by the National Environmental Policy Act, which concentrates decision making around issues, concerns, alternatives, and the effects of alternatives on the environment
National Forest Management Act (NFMA)	A law passed in 1976 as amendments to the Forest and Rangeland Renewable Resources Planning Act that require the preparation of Regional and Forest plans and the preparation of regulations to guide that development.
National Forest System (NFS)	All National Forest lands reserved or withdrawn from the public domains of the United States; all National Forest lands acquired through purchase, exchange, donation, or other means; the National Grasslands and land utilization projects administered under Title III of the Bankhead-Jones Farm Tenant Act (50 Stat. 525, 7 U.S.C. 1010-1012); and other lands, waters, or interests therein which are administered by the Forest Service or are designated for administration through the Forest Service as part of the system.
National Recreation Trails	Trails designated by the Secretary of the Interior or the Secretary of Agriculture as part of the national system of trails authorized by the National Trails System Act. National recreation trails provide a variety of outdoor recreation uses in or reasonably accessible to urban areas.
National Register of Historic Places	A listing maintained by the National Park Service of areas which have been designated as being of historical value. The Register includes place of local and State significance as well as those of value to the nation as a whole.
Natural Sediment Production	The amount of sediment produced in a watershed prior to any management activities such as roads or harvest. Natural, or baseline, sediment is a function of parent material, soil type, degree of weathering, glacial influences, etc.
No Action Alternative	An alternative where no management activities would occur beyond those currently under way. The development of a No Action Alternative is requested by regulations implementing the National Environmental Policy Act (40 CFR 1502.14). The No Action Alternative provides a baseline for estimating the effects of other alternatives.

Off-Highway Vehicle (OHV)	Off Highway Vehicle. Any motor vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland, or other natural terrain (36 CFR 212.1). Includes 4 wheel drive trucks, ATVs, UTVs, and snowmobiles.
Off-Route Exceptions	Under the Clearwater NF Travel Plan, motorized travel off of designated routes would be prohibited for all but over-snow vehicles. The exceptions would include off-route motorized travel in certain areas and under certain conditions for purposes of camping or parking, and it would be permissible to pull off the route to allow other traffic to pass. See Chapter 2, Actions Common to All Action Alternatives, Off-Route Exceptions.
Operator	Any person who is in physical control of a motorbike, all-terrain vehicle, or snowmobile.
Over-snow motorized vehicles	A motor vehicle that is designed for use over snow and that operates on a track or tracks and/or a ski or skis, while in use over snow (36 CFR 212.1).
Perennial Stream	A stream which normally flows throughout the year.
Prescription	Management practices selected and scheduled for application on a designated area to attain specific goals and objectives.
Primitive	Very high probability of experiencing solitude, freedom, closeness to nature, tranquility, self-reliance, challenge, and risk. An unmodified and natural environment prevails, with low interaction between users. Restrictions and controls are not evident after entry into the area, and access and travel is non-motorized. There is no evidence of vegetation alteration.
Proposed Action	In terms of the National Environmental Policy Act, the project, activity, or action that a Federal agency intends to implement or undertake and which is the subject of an environmental analysis.
Public Access	Usually refers to a road or trail route over which a public agency claims a right-of-way available for public use.
Range Allotment	A designated area of land available for livestock grazing upon which a specified number and kind of livestock may be grazed under a range allotment management plan. It is the basic land unit used to facilitate management of the range resource on National Forest System and associated lands administered by the Forest Service.
Ranger District	Administrative subdivision of the Forest supervised by a District Ranger.
Record of Decision (ROD)	A document separate from but associated with an environmental impact statement that publicly and officially discloses the responsible official's decision about an alternative assessed in the environmental impact statement chosen for implementation.
Recreation Opportunity Spectrum (ROS)	The framework for stratifying and defining classes of outdoor recreation environments, activities, and experiences which are arranged along a continuum or spectrum that is divided into seven classes: primitive, semi-primitive non-motorized, semi-primitive motorized, roaded modified,

	roaded natural, rural, and urban.
Recreation Visitor Day	Recreational use of National Forest developed sites or general forest areas which equals 12 visitor hours. A Recreation Visitor Day (RVD) may consist of 1 person for 12 hours, 12 persons for 1 hour, or any equivalent combination of continuous or intermittent recreation use by individuals or groups. 1 person in a campground for 24 hours equals 2 RVD's.
Right-Of-Way (ROW)	Land authorized to be used or occupied for the construction operation, maintenance, and termination of a project facility passing over, upon, under, or through such land.
Riparian Areas	Areas with distinctive resource values and characteristics that are comprised of aquatic and riparian ecosystems, 100-year floodplains and wetlands. They also include all upland areas within a horizontal distance of approximately 100 feet from the edge of perennial streams or other perennial water bodies.
Road	A motor vehicle route over 50 inches wide, unless identified and managed as a trail (36 CFR 212.1).
ROS	Recreation Opportunity Spectrum
ROW	Right-of-Way
Road Management	The combination of both traffic and maintenance management operations. Traffic management is the continuous process of analyzing, controlling, and regulating uses to accomplish National Forest objectives. Maintenance management is the perpetuation of the transportation facility to serve intended management objectives.
Roaded Natural	The opportunity to affiliate with other users in developed sites is available with some chance for privacy. Self-reliance on outdoor skills is only moderately important, and there is little challenge or risk. The area is a mostly natural-appearing environment as viewed from sensitive roads and trails. Interaction between users at campsites is of moderate importance. There are some obvious on-site controls of users, access and travel is conventional motorized including sedans and trailers, recreational vehicles, and some motor homes. Vegetation alterations are done to maintain desired visual and recreation characteristics.
Roadless Area	An area of National Forest which (1) is larger than 5,000 acres or, if smaller, is contiguous to a designated wilderness area or primitive area, 92) contains no roads, and (3) has been inventoried by the Forest Service for possible inclusion in the wilderness preservation system.
Roadless Area Review and Evaluation (RARE)	A comprehensive process instituted in June 1977 to identify roadless and undeveloped land areas in the National Forest System and to develop alternatives for both wilderness and other resource management. The second roadless area review and evaluation was conducted on public lands in 1977. This inventory has been updated for this analysis to exclude

	any area affected by recent development and no longer considered roadless.
Route	A road or trail (FSM 7705).
Security Area	Any area which, because of its geography, topography, and/or vegetation, will hold elk during periods of stress. For this project, a security area is defined as a block of dense forested cover at least 250 acres in size and located at least 1/2 mile from any roads open to motorized traffic during the general hunting season.
Sediment	Any material, carried in suspension by water, which will ultimately settle to the bottom of streams.
Sediment Yield	The amount of material eroded from the land surface by runoff and delivered to a stream system.
Semi-Primitive Non-Motorized	There is a high quality of experiencing solitude, closeness to nature, tranquility, self-reliance, challenge, and risk. It is a natural-appearing environment with low interaction between users. There are a minimum of on-site controls, and access and travel are non-motorized. Vegetation alterations are widely dispersed and not obvious.
Semi-Primitive Motorized	There is a moderate opportunity for solitude, tranquility, and closeness to nature. There is a high degree of self-reliance, challenge, and risk in using motorized equipment. The area is predominantly natural-appearing, and there is a low concentration of users, but often evidence of other users on the trails. There are minimum site controls, and restrictions are present but subtle. Vegetation alterations are very small in size and number widely dispersed and not obvious.
Sensitive Species	Species (plants or animals) with special habitat needs that may be influenced by management programs.
Site Productivity	The production capability of specific areas of land.
Snag	A standing dead tree used by birds for nesting, roosting, perching, courting, or foraging for food and by some mammals for escape cover, denning, and reproduction.
Snowmobile	Any self-propelled vehicle under one thousand pounds unleavened gross weight, designed primarily for travel on snow or ice or over natural terrain, which may be steered by trucks, skis, or runners.
Soil Productivity	The capacity of a soil to produce a specific crop such as fiber and forage, under defined levels of management. It is generally dependent on available soil moisture and nutrients and length of growing season.
Stand	A plant community of trees which possess uniformity in vegetation type, age class, vigor, size class, and stocking class and one which is distinguishable from adjacent forest communities.

Standard	An objective requiring a specific level of attainment; a rule to measure against; a guiding principle.
Stream Order	A measure of the position of a perennial stream in the hierarchy of tributaries. First order streams are unbranched streams; they have no tributaries. Second order streams are formed by the confluence of two more first order streams. Third order streams are formed by the confluence of two or more second order streams; they are considered third order until they join another third order or larger stream.
Suitable Forest Land	Forest land (as defined in CFR 219.13) for which technology is available that will ensure timber production without irreversible resource damage to soils, productivity or watershed conditions; for which there is reasonable assurance that such lands can be adequately restocked (as provided in CFR 219.14), and for which there is management direction that indicates that timber production is an appropriate use of that area.
Supply Limited Stream	A supply (sediment) limited stream has more energy available during a typical year than there is sediment in the stream channel available to be moved. The excess energy leads to a resilience that enables the system to recover and cleanse itself if extreme sediment loads are not delivered in a short period of time.
System Road; Forest System Road	A road that is part of the Forest development transportation system, which includes all existing and planned roads, as well as other special and terminal facilities designated as Forest development transportation facilities.
Temporary Roads	Roads which are constructed for a one time or short term use which are not expected to be utilized in the future. These roads will be obliterated after the need is past.
Terrestrial	Living or growing on land; not aquatic.
Thermal Cover	Cover used by animals to ameliorate effects of weather; for elk, a stand of coniferous trees 40 feet or taller with an average crown closure of 70 percent or more.
Threatened Species	Any species that is likely to become an endangered species within the foreseeable future throughout all of a significant portion of its range and one that has been designated as a threatened species in the Federal Register by the Secretary of the Interior.
Trailhead	The parking, signing, and other facilities available at terminus of a trail.
Turbidity	Sediment or foreign particles stirred up or suspended in water.
Unauthorized Routes	A road or trail that is not a forest road or trail or a temporary road or trail and that is not included in a forest transportation atlas (36 CFR 212.1). This includes user-created trails.
User-created Routes	Any route currently not managed as a component of the forest transportation system. These include off-road vehicle tracks which have not been designated and managed as a trail, and which may or may not be

	legal under the 2001 Tri-State Off-Highway Vehicle Decision. They also include travel ways abandoned from the forest transportation system, but still exist on the ground and continue to receive use by the public. For this project user-created route, unclassified and unauthorized routes are used interchangeably.
Viewshed	A total landscape as seen from a particular viewpoint.
Visual Quality Objectives (VQOs)	The degree of acceptable alteration of the characteristic landscape.
Visual Resource	The composite of basic terrain, geologic features, water features, vegetative patterns, and land use effects that typify a land unit and influence the visual appeal the unit may have for visitors.
Watershed	The total area above a given point on a stream that contributes water to the flow at that point.
Wilderness Character	Wilderness character attributes are: Natural Integrity, Apparent Naturalness, Outstanding Opportunities for Solitude, and Opportunities for Primitive, Unconfined Recreation. These features were evaluated using capability analyses as conducted in 1978 using the Wilderness Attribute Rating (WAR) System and in 2005 using the Area Capability Assessment (ACA) Process. These analysis techniques rate wilderness character attributes as identified by the 1964 Wilderness Act.

Acronyms

BE	Biological Evaluation
BLM	Bureau of Land Management
BMPs	Best Management Practices
BO	Biological Opinion
CDNST	Continental Divide National Scenic Trail
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DEIS	Draft Environmental Impact Statement
DEQ	Department of Environmental Quality
EAU	Elk Analysis Unit
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Endangered Species Act
FEIS	Final Environmental Impact Statement
FP	Forest Plan
FR	Federal Register

FS	Forest Service
FSH	Forest Service Handbook
FSM	Forest Service Manual
FWS	Fish and Wildlife Service
GIS	Geographic Information System
HUC	Hydrologic Unit Code
IDT	Interdisciplinary Team
INFISH	Inland Native Fish Strategy (July 28, 1995)
INFRA	Infrastructure Database (the database of record for Forest Service roads and trails)
IPM	Integrated Pest Management
IRA	Inventoried Roadless Area
LAU	Lynx Analysis Unit
LTA	Landtype Association
MIS	Management Indicator Species
MVUM	Motor Vehicle Use Map
NEPA	National Environmental Policy Act
NF	National Forest
NFMA	National Forest Management Act
NFS	National Forest System
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NRLMD	Northern Rockies Lynx Management Direction
OHL	Off-highway Legal
OHV	Off Highway Vehicle
PL	Public Law
RARE	Roadless Area Review and Evaluation
ROD	Record of Decision
ROS	Recreation Opportunity Spectrum
ROW	Right-of-Way
SHPO	State Historic Preservation Officer
SPM	Semi-Primitive Motorized
SPNM	Semi-Primitive Non-Motorized
SWCP	Soil and Water Conservation Practices
TMDL	Total Maximum Daily Load

USC	United States Code
USDA	United States Department of Agriculture
USDI	United States Department of the Interior
USFWS	United States Fish and Wildlife Service
VQOs	Visual Quality Objectives

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Appendices

Appendix A: Forestwide Standards, Forest Plan Consistency and Management Area Direction

Appendix B: Cumulative Effects

Appendix C: Wildlife Additions

Appendix D: Response to Comments

Appendix E: Route by Route Comparison

Appendix A. Forestwide Standards, Forest Plan Consistency, and Management Area Direction

This appendix contains two tables. The first table displays the forestwide standards and forest plan consistency as it relates to this project. Appendices referenced in the 'Standard' column on the left refer to the appendices for the Helena National Forest Plan. The second table displays the management area direction for the project.

Table 1 - Forestwide Standards and Forest Plan Consistency

Standard	If Standard applies, how is standard being met
Recreation	
1. New campgrounds and other developed recreation facilities, such as boat ramps or picnic areas, will generally not be constructed. Continue to maintain existing developed sites, but emphasize providing dispersed recreation opportunities. Removal of existing sites may be necessary, in some cases, due to site deterioration or excessive maintenance cost.	This standard is not applicable to the Divide Travel Proposal. The resulting travel decision would not authorize any new developed recreation facilities.
2. Encourage ski-touring trail development by locating and marking additional trails and by encouraging the private sector to develop trails.	This standard is not applicable to the Divide Travel Proposal.
3. Complete a Recreation Opportunity Guide (ROG) for each Ranger District, to make recreation opportunities more visible to the public.	This standard is not applicable to the Divide Travel Proposal.
4. A specific Continental Divide National Scenic Trail (CDNST) route will not be identified prior to approval of the comprehensive plan being prepared by the Forest Service and the Secretary of Agriculture's Advisory Council. Once the comprehensive plan is approved, the management direction will be incorporated further in this plan. Based on the Comprehensive Plan, a more detailed analysis will be completed to show trail segments, objectives and specific route locations. The legislation authorizing the CDNST specifically intended that the trail would not adversely affect or preclude the application of normal management practices on lands adjacent to or within the trail corridor (both public and private). It is not the intent of the legislation that a separate "management plan" be developed for the CDNST, but to provide for the development and management of the trail as a management practice which is integrated into the overall prescription for the land through which the trail passes.	This standard is not applicable to the Divide Travel Proposal. New CDT routes are not proposed under this project. The resulting travel decision would only designate the type of use allowed on the CDT.
5. Emphasize "Pack-In Pack-Out" use in dispersed recreation areas and in wilderness to reduce resource impacts and management costs.	This standard is not applicable to the Divide Travel Proposal.
6. Provide information to users of remote areas and wilderness about potential conflicts with humans and bears and proper camping methods to avoid such conflicts.	This standard is not applicable to the Divide Travel Proposal.

Standard	If Standard applies, how is standard being met
7. Outfitter and guide use will generally be maintained at a level determined from the highest 2 years of actual use experienced during the period l979 through l983. Application for additional or new use will be considered on a case-by-case basis, with consideration of resource limitations and public need.	This standard is not applicable to the Divide Travel Proposal.
Visuals	
1. A visual quality objective (VQO) is stated for each management area. These visual quality objectives provide the guidelines for altering the landscape. Portions of each management area may have a more or less restrictive VQO. Appendix B lists roads, trails, campgrounds, etc., that are within sensitive viewing areas. The VQO for these areas is noted in Appendix B. The VQO's for the Continental Divide National Scenic Trail will be the same as the Management Areas through which the trail passes.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize new route construction.
Cultural Resources	
1. The Forest will undertake a systematic program of cultural resource inventory, evaluation, and preservation aimed at the enhancement and protection of significant cultural resource values, as prescribed for Federal Agencies by Section 106 of the National Historic Preservation Act and 36 CFR 800. Cultural resource sites evaluated as significant will be preserved in place whenever possible. When such resources are threatened by project development, an effort to avoid or minimize adverse impact by project redesign will be made. When avoidance is judged by the Forest Supervisor to be imprudent or infeasible, the values of the site will be conserved through proper scientific excavation, recordation, analysis, and reporting. An inventory survey for cultural resources will be made for all significant ground-disturbing activities. Forest inventory efforts will be focused in three areas including: a. Areas where specific project activities, such as timber sales, road developments, range improvements, or mineral development activities, result in significant ground disturbance. b. Large areas where substantial development impact is anticipated, such as oil- and gas-planning areas. c. Areas where formal archaeological surveys may provide management data that are broadly applicable to ecologically similar areas and which will facilitate the development of predictive models capable of addressing issues of cultural site density, distribution, and significance. The Forest will encourage scientific research by privately funded universities as a means of acquiring additional inventory and interpretive data. Such projects will be coordinated with the State Historic Preservation Officer and the Advisory Council on Historic Preservation. Cultural resource site information is exempt from disclosure under the Freedom of Information Act. Following Forest Supervisor written approval, site location data may be released on a need-to-know basis to consultants, universities, or museums. Discovered cultural resources will be evaluated in relation to published Advisory Council on Historic Preservation (ACHP) criteria for eligibility to the National Register of Historic Places.	Completed National Historic Preservation Act Section 106 process for the Divide Travel Plan project- inventory, evaluation of significance, evaluation of project effect, State Historic Preservation Office and Tribal consultation. Particular consideration given to cultural resources listed on the National Register of Historic Places.

Standard	If Standard applies, how is standard being met
Cultural resource sites determined eligible will be nominated to the National Register. The Forest will coordinate cultural resource issues and concerns with the appropriate Native American groups to ensure that Forest management activities are not detrimental to the protection and preservation of Native American religious and cultural sites, treaty rights, and religious and cultural practices. The Forest will enhance and interpret significant cultural sites for the education and enjoyment of the public when such development will not degrade the cultural property or conflict with other resource considerations. Known significant cultural resource sites on the Forest will be protected from inadvertent or intentional damage or destruction. Portions of the Lewis and Clark National Historic Trail are on the Helena Forest. Some interpretive signing has been placed along the trail. Normal management practices can still access land adjacent to or within the trail corridor, however, project activities will be conducted to minimize disturbance to the cultural site.	
Wildlife and Fish Indicator Species	
1. Populations of wildlife "indicator species" will be monitored to measure the effect of management activities on representative wildlife habitats with the objective of ensuring that viable populations of existing native and desirable non-native plant and animal species are maintained. See Chapter IV, part D Monitoring and Evaluation for specific monitoring requirements. Indicator species have been identified for those species groups whose habitat is most likely to be changed by Forest management activities. The mature tree dependent group indicator species is the marten; the old growth dependent group is represented by the pileated woodpecker and the goshawks; the snag dependent species group is represented by the hairy woodpecker; the threatened and endangered species include grizzly bear, gray wolf, bald eagle and peregrine falcon; commonly hunted indicator species are elk, mule deer and bighorn sheep; fish indicator species is the cutthroat trout.	Habitat has been modeled for many of the MIS for which there are potential effects; the documentation is in the project file. No alternatives propose new road or trail construction: As a result, there is no habitat modification directly associated with the Travel Plan. Indirectly, habitat components in the road corridors—primarily snag and logs—would be removed by firewood cutters. This removal is insufficient to influence local population structure or region-wide viability. For species directly influenced by road density (grizzly bear, elk, mule deer, marten), no alternative increases density, and the 3 action alternatives decrease it. The MIS standard for fish applies. Westslope cutthroat trout habitat has been altered as a function of existing high risk roads and crossings as documented in the fisheries report. Fish habitat will be maintained because this effort results in no ground disturbance activities as a result to administratively open or close roads. Monitoring of fish populations will not occur. Monitoring of fine sediments in streams will be accomplished as part of Forest-wide intra-gravel sediment monitoring using McNeil core samplers (Information included in the Forest Annual Monitoring Report).
Big Game	
Big Game 1. On important summer and winter range, adequate thermal and hiding cover will be maintained to support the habitat potential.	Not applicable: thermal and hiding cover habitat are not affected under any alternative.
2. An environmental analysis for project work will include a cover analysis. The cover	A hiding cover analysis was conducted to determine compliance

<table>
<tr><th>Standard</th><th>If Standard applies, how is standard being met</th></tr>
<tr><td>analysis should be done on a drainage or elk herd unit basis. (See Montana Cooperative Elk-Logging Study in Appendix C for recommendations and research findings on how to maintain adequate cover during project work.)</td><td>with hiding cover/open road density standard. See Elk in Affected Environment and Environmental Consequences.</td></tr>
<tr><td>3. Subject to hydrologic and other resource constraints, elk summer range will be maintained at 35 percent or greater hiding cover and areas of winter range will be maintained at 25 percent or greater thermal cover in drainages or elk herd units.</td><td>Not applicable: thermal and hiding cover are not affected.</td></tr>
<tr><td>4. Implement an aggressive road management program to maintain or improve big game security. To decide which roads, trails, and areas should be restricted and opened, the Forest will use the following guidelines developed with the Montana Department of Fish, Wildlife, and Parks (MDFWP). The Forest visitor map will document the road management program.
4a. Road management will be implemented to at least maintain big game habitat capability and hunting opportunity. To provide for a first week bull elk harvest that does not exceed 40 percent of the total bull harvest, roads will be managed during the general big game hunting season to maintain open road densities with the following limits.
<table>
<tr><th>Existing Percent Hiding cover (according to FS definition of hiding cover) (1)</th><th>Existing Percent Hiding Cover (according to MDFWP definition of hiding cover) (2)</th><th>Max Open Road Density</th></tr>
<tr><td>56</td><td>80</td><td>2.4 mi/mi (2)</td></tr>
<tr><td>49</td><td>70</td><td>1.9 mi/mi (2)</td></tr>
<tr><td>42</td><td>60</td><td>1.2 mi/mi (2)</td></tr>
<tr><td>35</td><td>50</td><td>0.1 mi/mi (2)</td></tr>
<tr><td>(1) A timber stand which conceals 90 percent or more of a standing elk at 200 feet.</td><td>(2) A stand of coniferous trees having a crown closure of greater than 40 percent.</td><td></td></tr>
</table>
The existing hiding cover to open road density ratio should be determined over a large geographic area, such as a timber sale analysis area, a third order drainage, or an elk herd unit.</td><td>See Tables in the Elk Analysis Section—particularly under Environmental Consequences.
Only one of 6 elk herd units currently complies with this Forest Plan Big Game Security Index. In spite of substantial open road closures in some elk herd units under all 3 action alternatives, compliance/non-compliance with the standard does not change in any case.</td></tr>
<tr><td>4b. Elk calving grounds and nursery areas will be closed to motorized vehicles during peak use by elk. Calving is usually in late May through mid-June and nursery areas are used in late June through July.</td><td>No new road closures specifically target elk calving areas, but some calving sites will benefit from the closures that focus on productive areas known to be important in multiple ways to big game. MFWP has not indicated a need for new closures to protect</td></tr>
</table>

Standard	If Standard applies, how is standard being met
	elk calving areas. The nature of local wildlife resources is discussed in detail in *Local Effects in Key Areas.*
4c. All winter range areas will be closed to vehicles between December 1 and May 15. Exceptions (i.e., access through the winter range to facilitate land management or public use activities on other lands) may be granted.	Roads designated as "crossing routes" through winter range to facilitate access to areas outside winter range will remain stable under all alternatives. A number of existing snowmobile routes intrude into the upper reaches of winter range: These routes do not increase under any alternative. See *Environmental Consequences: Elk Winter Range.*
4d. At restricted roads, trails, and areas, signs will be posted which tell: 1. Type of restriction. 2. Reason for restriction. 3. Time period of restriction. 4. Cooperating agencies.	Signing is not a part of this phase of travel planning (which is concerned only with the rationale and decisions to open or close roads).
4e. Roads that will be closed will be signed during construction or reconstruction telling the closure date and the reason for closure.	Signing is not a part of this phase of travel planning.
4f. Enforcement is a shared responsibility. Enforcement needs will be coordinated with the MDFWP.	The need for enforcement has been discussed with MFWP. The details of enforcement are not part of this phase of travel planning.
4g. Opened Forest roads will normally have a designed speed of less than 15 miles per hour. Exact design speeds will be determined through project planning. Loop roads are not recommended and will be avoided in most cases.	Alternative 1 preserves existing loop routes. Alternatives 2, 3, and 4 close some loop routes. Speed limit designations are not part of this phase of travel planning.
4h. The Forest Road Management Program will be developed in conjunction with MDFWP and interested groups or individuals. The Road Management Program will contain the specific seasonal and yearlong road, trail, and area restrictions and will be based on the goals and objectives of the management areas in Chapter III of the Forest Plan.	Meetings have been held with MFWP over a period of years during Travel Plan Development. More will be held to discuss specific details of the current proposals. Meeting notes in the project file.
4i. Representatives from the Helena Forest and MDFWP will meet annually to review the existing Travel Plan.	Coordination meetings have taken place for travel planning efforts as well as general program of work. Implementation phase.
5. On elk summer range the minimum size area for hiding cover will be 40 acres and the minimum size area on winter range for thermal cover will be l5 acres.	Not applicable: hiding and thermal cover will not be affected.
6. Montana Cooperative Elk-Logging Study Recommendations, in Appendix C, will be followed during timber sale and road construction projects.	Some of the recommendations are applicable to project implementation, but not this phase of Travel Planning.
7. Inventorying and mapping important big game summer/fall and winter ranges will continue.	Ongoing
8. Any proposed sagebrush reduction programs will be analyzed on a case-by-case basis	Not applicable: No sagebrush is proposed for removal.

Standard	If Standard applies, how is standard being met
for the possible impact on big game winter range.	
9. Occupied bighorn sheep and mountain goat range will be protected during resource activities. Project plans for livestock, timber, or other resource development will include stipulations to avoid or mitigate impacts on their range. Conflicts between livestock and these wildlife species will be resolved in favor of the big game.	Not applicable: No proposals to affect or modify habitat in occupied bighorn sheep and mountain goat range.
10. Moose habitat will be managed to provide adequate browse species diversity and quantity to support current moose populations.	Not applicable: No habitat will be modified.
Threatened and Endangered (T&E) Species	
1. A biological evaluation will be written for all projects that have potential to impact any T&E species or its habitat. All evaluations will address each projects potential to adversely modify a listed species habitat or behavior. If an adverse impact is determined, mitigation measures will be developed to avoid any adverse modification of a listed species habitat or behavior. If all possible mitigation measures do not result in a no effect determination, then informal and/or formal consultation with the U.S. Fish and Wildlife Service will be initiated.	The analysis of TES species in the Wildlife Specialist's Report serves as the Biological Evaluation for this travel planning effort. A separate Biological Assessment of T&E species will be prepared and submitted to the USFWS for consultation. A biological evaluation will be completed for sensitive westslope cutthroat trout and pearlshell mussels, and a bull trout biological assessment will be prepared and submitted to the USFWS. Because of adverse baseline conditions to listed species habitat (cumulative effects), formal consultation with the U.S., Fish & Wildlife Service via a bull trout biological assessment will be initiated.
2. Grizzly bear -- Apply the guidelines in Appendix D to the Management Situation 1 and 2 (referred to essential and occupied prior to 1984) grizzly bear habitat on the Forest (see map in Appendix D). Initiate field studies in undesignated areas known to be used by grizzlies, to determine if the areas should be designated as grizzly habitat. Until sufficient evidence is available to determine the status of these areas, manage them according to Appendix E, Grizzly Management Guidelines Outside of Recovery Areas.	Guidelines in *Forest Plan* Appendix D are for Recovery zones and do not apply to the Travel Plan Area. Guidelines in Appendix E, which do apply to this area, have been used. Discussion is in the Wildlife Specialist's Report under sections on *Grizzly Bear* and in the Biological Assessment.
3. In occupied grizzly habitat, to minimize man-caused mortality the open road density will not exceed the 1980 density of 0.55 miles per square mile, which was determined to have little effect on habitat capability.	The "Grizzly Bear Distribution Zone" is a modified version of "occupied grizzly habitat" outside a Recovery Zone not contemplated by the *Forest Plan.* Unweighted road density in the Distribution Zone is 1.8 mi/mi². There is no *Forest Plan* "occupied habitat" in the Travel Plan Area. See the discussion under *Environmental Consequences: Grizzly Bear.*
4. Research activity on grizzly bears or their habitat will be reviewed by the Research Subcommittee of the Interagency Grizzly Bear Committee.	Not applicable to this effort.
5. Bald Eagle and Peregrine Falcon -- Continue working with the MDFWP, the USFWS, and the BLM to identify nesting and wintering areas. Identify nesting territories and	Monitoring of peregrine falcon eyries and bald eagle nests has been ongoing on the HNF since the late 1980s. Both species have

Standard	If Standard applies, how is standard being met
roosting sites, and protect both from adverse habitat alteration. (Guidelines for how to identify bald eagle habitat are in the Wildlife Planning Records.) Powerlines constructed within bald eagle or peregrine falcon habitat will be designed to protect raptors from electrocution. See Appendix D for bald eagle and peregrine falcon habitat maps.	been removed from the endangered species list in recent years, and neither is affected in any measurable way by Travel Plan alternatives. See discussion under *Sensitive Species.*
6. Gray Wolf -- With the USFWS and MDFWP, investigate reported gray wolf observations to confirm or deny gray wolf presence. If presence of gray wolf is confirmed, determine if the habitat is necessary for the wolf's recovery. If the habitat is necessary, coordinate with the MDFWP and the USFWS to implement the Wolf Recovery Plan. See Appendix D for gray wolf habitat map.	The wolf is no longer listed as a threatened or an endangered species. Effects on wolves and communications with the USFWS and MFWP are discussed in sections on the *Wolf* under *Sensitive Species.*
7. No known threatened or endangered plants are on the Helena National Forest.	This standard is being met. There are no known threatened or endangered plants on the HNF.
8. Species of Special Concern There are habitats on the Forest where the following species of special concern may be found (Plant Species of Special Concern, USDA-FS, l980) Lemhi penstemon (*Penstemon lemhiensis*), Howell's gumweed (*Grindelia howellii*), Missoula phlox (*Phlox missoulensis*), Cliff toothwort (*Cardamine rupicola*). Missoula phlox and cliff toothwort have been located on the Helena Forest. Other Plants that are termed rare have also been located on the Helena Forest. They are Klaus' bladderpod (*Lesquerella plausii*) and Long-styled thistle (*Cirsium longistylum*). Two additional rare plants, Moschatel (*Adoxa moschalellina*) and Lesser rushy milkvetch (*Astragalus connvallarius*) are believed to occur on the Helena Forest but currently have no occurrence records. If any of these species are verified on the Helena Forest, appropriate measures, pursuant to Section 7 of the Endangered Species Act, will be taken.	If populations have been/are found, they would be protected from ground disturbance or herbicide application. As directed by the Forest Plan, if any of the species of special concern are verified, appropriate measures would be taken.
Old Growth	
An old growth stand is generally characterized by a high level of standing and down, dead and rotting woody material; two or more levels of tree canopies and a high degree of decadence indicated by heart rot, mistletoe, dead or broken tree tops, and moss. Five percent of each third order drainage should be managed for old growth. The priority for old growth acres within each drainage is: first, land below 6000 feet in elevation; second, riparian zones and mesic drainage heads; and third, management areas emphasizing wildlife habitat. These areas will normally be managed on a 240 year rotation and will range from 10 acres to several hundred acres. Management areas other than T-1 through T-5 will be the primary source for old growth. However, if adequate old growth area cannot be achieved then the T management areas will be considered to meet old growth objectives.	These guidelines are not applicable to this travel planning effort.

Standard	If Standard applies, how is standard being met
Snags	
1. To keep an adequate snag resource (standing dead trees) through the planning horizon, snags should be managed at 70 percent of optimum (average of two snags/acre) within each third order drainage.	The effects of travel management on dead trees are discussed in detail in sections on *Snags* and MIS and TES species dependent on snags and logs. Since no new roads or trails would be constructed, all effects will be indirect, stemming from the access that open roads give to firewood cuttters and magnified currently by the ongoing bark beetle epidemic.
2. Snag management guidelines need not be applied within a quarter mile of riparian areas, because riparian standards should provide for adequate snags.	See sections addressing *Riparian Habitats* for a discussion of snag management in riparian areas.
3. Larch, ponderosa pine, Douglas-fir, spruce, and subalpine fir, in that priority, are the preferred species for snags and replacement trees (live trees left to replace existing snags).	Not applicable to travel management
4. Management areas other than T-1 should be the primary source for snag management. However, if adequate snags cannot be found outside of T-1, then the following numbers and sizes of snags should be retained in cutting units, if available. A. In units with snags, keep a minimum of 20 snags and 10 replacement trees per 10 acres, if available. If 20 snags are not available, then any combination totaling 30 should be left, by the following dbh classes: 13 snags and 6 replacement trees from 7-11 inches 5 snags and 3 replacement trees from 12-19 inches 2 snags and 1 replacement trees 20+ inches B. In units--except those of pure lodgepole--without snags keep a minimum of 30 wind firm trees per 10 acres, if available, by the following dbh classes: 21 trees from 7-11 inches 7 trees from 12-19 inches 2 trees from 20+ inches If wildlife funds are available, a third of the replacement trees should be girdled or otherwise killed to provide snags, by the following dbh classes: 7 trees from 7-11 inches dbh 2 trees from 12-19 inches dbh 1 tree from 20+ inches dbh	See sections on *Snags* for a discussion of how travel management is likely to indirectly affect snag distribution. These guidelines are essentially inapplicable to this travel planning effort.
Fisheries	
1. Maintain quality water and habitat for fish by coordinating Forest activities and by direct habitat improvement (see Forest Wide Standards for riparian).	Standard applies. Although current fish habitat conditions have been compromised to various degrees by the current road system, this decision would help maintain habitat by closing up to 52% of

Standard	If Standard applies, how is standard being met
	high risk roads and 48% of open stream crossings. Through close coordination with fisheries, three high risk fords would be closed to motorized traffic until approved bridge or similar bottomless crossings could be installed.
2. Instream activities should allow for maximum protection of spring and fall spawning habitats.	Standard applies. Several cumulative (present and foreseeable future) actions on roads and existing crossings identified under the roads analysis are designed to improve and stabilize road drainage to minimize risk of sediment delivery into the stream system.
3. Structures installed within streams supporting fisheries will be designed to allow upstream fish movement, especially to spawning areas.	Standard applies. Seven crossing structures west of the Divide are funded for upgrades to replace undersized culverts and allow for aquatic species passage as it relates to cumulative actions. All work within streams is closely coordinated with fisheries and the state to ensure spawning habitats become accessible and are not adversely affected by sediment.
Range	
1. Riparian condition within livestock allotments will be mapped and become part of the Allotment Management Plan.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
2. Where analysis shows range resource damage, the cause will be identified and corrective action will be initiated through an allotment management plan.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
3. Chemical spraying should not be used on sagebrush control projects if other control methods are feasible.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
4. Best Management Practices (BMPs) will be used to minimize livestock damage to lakeside soils, stream sides, and other fragile areas.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
5. Allotment management plans will specify the utilization standards of key plant species needed to protect the soil and water quality. Allowable forage utilization of these plants should be based on local range conditions, soil stability, and known individual plant requirements. The guides for allowable utilization of key species, by condition classes, are in the Range Management Handbook (FSH 2209.21).	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
6. Allotment Management Plans will be developed using the interdisciplinary process.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.

Standard	If Standard applies, how is standard being met
Noxious Weeds	
1. Implement an integrated weed control program in cooperation with the state of Montana and County Weed Boards to confine present infestations and prevent establishing new areas of noxious weeds. Noxious weeds are listed in the Montana Weed Law and designated by County Weed Boards.	This standard is applicable to project implementation.
2. Integrated Pest Management, which uses chemical, biological, and mechanical methods, will be the principal control method. Spot herbicide treatment of identified weeds will be emphasized. Biological control methods will be considered as they become available.	This standard is applicable to project implementation.
3. Funding for weed control on disturbed sites will be provided by the resource which causes the disturbance.	This standard is applicable to project implementation.
Revegetation	
1. Seeding will be done in a timely manner on disturbed areas, to prevent erosion and to achieve best re-vegetation results.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any ground disturbance.
2. Seeding mixtures of native plants (naturally occurring) should be used, if practical, in all re-vegetation projects greater than two acres. On smaller disturbances, the responsible official may authorize the use of exotic species.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any seeding.
3. Seeding guidelines, based on elevation, soil type, parent material, habitat type, and reasonable cost, are listed in Appendix F.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any seeding.
Timber	
1. Silvicultural examinations and prescriptions will be required before any timber manipulation or silvicultural treatment takes place. Exceptions include cutting of trees that block vision along roads, cutting hazard trees, clearing right-of-way, clearing for mineral development, minor and incidental amounts of free use, and cutting personal firewood. Final determination of what silvicultural system will be used for a particular project will be made by a certified silviculturist after an on-the-ground site analysis. This site specific analysis will determine the appropriate even or un-even age silvicultural system that best meets the goals and objectives of the management area. Standards for applying all silvicultural systems, as well as supporting research references are in the Northern Region guide (June 10, 1983). In addition, broad guidelines are found in Appendix H and M. Even aged management methods will be used only where it is determined to be appropriate to meet objectives. Clearcutting will be used only where it is the optimum method.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or manipulating.

Standard	If Standard applies, how is standard being met
2. Tree improvement will be conducted in accordance with the current Regional and Forest level tree improvement plans.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any tree improvements.
3. Transportation plans and logging systems must be designed jointly to provide for long-term stand management, with full consideration given to topography and slope, the overall economic efficiency of roading and yarding costs, and the needs of other resources.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any ground disturbance.
4. Timber stand openings created by even-aged silvicultural systems will normally be 40 acres or less. Creation of larger openings will require a 60-day public review and Regional Forester approval. Exceptions are listed in the Northern Regional Guide.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize changes in timber management.
5. A feasibility analysis of each sale over one million board feet will be made to assure that it has been designed with the most cost-effective measure possible in keeping with environmental concerns. This analysis will examine strategic items in the sale design process to assure consideration of economic impacts of these items on the sale value. A cash flow analysis will be done to determine the viability of the sale with current market conditions. If anticipated costs are higher than predicted high bids, consider the following: a. Defer the sale until economic conditions would indicate receiving higher bids. b. Proceed to sell the timber and provide proper documentation that benefits, other than immediate monetary return from the timber, are of importance.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber sales.
Firewood	
1. The Helena Forest will generally charge a fee for personal use firewood. The Regional Office will annually determine the fee. Designated free firewood areas will continue only as long as demand is less than supply.	This standard is not applicable to the Divide Travel Project proposal. The resulting travel plan decision is an administrative action and does not authorize any fee for personal use firewood.
2. Logging areas will be open to public firewood gathering after the sale is closed and prior to burning logging debris and closing roads, if wood is available and other resource values, such as wildlife snags, downed logs, and soils, can be protected.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any logging activities.
3. Promote a green firewood program where desirable for resource management for both commercial and private firewood gatherers.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or firewood gathering.
4. The public will be informed of firewood gathering opportunities through the local media. Maps and directions to firewood gathering areas will be available at FS offices.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any firewood gathering opportunities.
5. Permits will be required whenever tractors, rubber-tired skidders, jammers, or other yarding equipment normally used by the logging industry are used for yarding firewood.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or logging activities.

Standard	If Standard applies, how is standard being met
6. Providing firewood will be emphasized as a slash treatment method.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or logging activities.
Water, Soil, and Air - Municipal Watershed Guidance	
1. Municipal watersheds will be managed under multiple-use concepts and direction. Management area guidelines will identify permissible land uses, restrictions on land uses, and special measures required to ensure a high quality and quantity municipal water supply. Presently, there are two municipal watersheds on the Forest, Tenmile and McClellan.	The proposed travel plan is consistent with multiple-use concepts and direction. The proposed travel plan does not specifically address water quality concerns in the Tenmile Creek watershed. The proposed travel plan does not specifically address management actions that might reduce the impact of road sediment to water quality, as this decision only dictates the open-or-closed status of the routes in the planning area.
2. Design and implementation of projects within the watershed will be guided by FSM 2542.12, as well as specific management area standards and guidelines.	The proposed travel plan does not specifically address management actions that might reduce the impact of road sediment to water quality, as this decision only dictates the open-or-closed status of the routes in the planning area.
3. An environmental analysis will be prepared in coordination with the concerned municipality and the State Water Quality Bureau for each new project proposed within the municipal watershed which could potentially result in degradation of water quality.	This standard does not apply, as the decision does not authorize any new ground-disturbing activities and would not directly result in any additional degradation of water quality beyond current levels.
4. Each project implemented in the municipal watersheds will have a designated Forest Service representative responsible for maintenance of water quality within appropriate state standards. Each contractor will designate a representative, who will normally be at the project site, with the authority to take whatever action necessary to remedy any situation which might result in violation of state water quality standards.	This standard does not apply, as the decision does not authorize any new ground-disturbing activities and would not directly result in any additional degradation of water quality beyond current levels.
5. Plans and specifications for projects proposed for municipal watersheds will be coordinated with the municipality involved and submitted to the Montana State Department of Health and Environmental Sciences for review and approval as required by Montana Laws regarding public water supply as amended by Chapter No. 556, l979, 75-6-112.	This standard does not apply, as the decision does not authorize any new ground-disturbing activities and would not directly result in any additional degradation of water quality beyond current levels.
General Watershed Guidance	
1. Coordination with the State of Montana, as required by the Clean Water Act (33 CFR §208), concerning stream channels and water quality protection.	This standard does not apply, as the decision does not authorize any new ground-disturbing activities and would not directly result in any additional degradation of water quality beyond current levels.
2. Watershed improvement projects will be identified, prioritized, and developed on a watershed basis (see Appendix T).	Not applicable
3. A project which causes excessive water pollution, undesirable water yield, soil erosion,	This standard does not apply, as the decision does not authorize

Standard	If Standard applies, how is standard being met
or site deterioration will be corrected where feasible, or the project will be re-evaluated or terminated.	any new ground-disturbing activities and would not directly result in any additional degradation of water quality beyond current levels.
4. Projects involving significant vegetation removal will, prior to including them on implementation schedules, require a watershed cumulative effects feasibility analysis to ensure that water yield or sediment will not increase beyond acceptable limits. The analysis will also identify opportunities, if any exist, for mitigating adverse effects on water-related beneficial uses.	Not applicable - no vegetation removal is authorized in this decision
5. Practices in the Soil and Water Conservation Practices Handbook (FSH 2509.22) developed cooperatively by the State Water Quality Agency and the Forest Service will be incorporated, where appropriate, into all land use and project plans as a principal mechanism for controlling non-point pollution sources and meeting soil, State water quality standards and other resource goals.	This standard does not apply, as the decision does not authorize any new ground-disturbing activities and would not directly result in any additional degradation of water quality beyond current levels.
6. Water rights for non-consumptive water uses (instream flows) necessary to maintain fisheries habitat, recreational uses, or other beneficial water uses will be claimed for appropriate waterbodies and streams.	Not applicable
7. An environmental analysis, following the process in FSMs 2526 and 2527, will be made for all management actions planned for flood plains, wetlands, riparian areas, or bodies of water prior to implementation. This analysis will determine the short- and long-term adverse impacts and mitigating measures associated with the planned management actions.	This standard does not apply, as the decision does not authorize any new ground-disturbing activities and would not directly result in any additional impact to floodplains, wetlands, riparian areas, or bodies of water beyond current levels.
8. Water transmission lines, dams, and hydro-meteorological data sites will be maintained by the permittee in a safe and serviceable condition. Unsafe or unserviceable facilities will be repaired to approved engineering standards or removed from service.	Not applicable
9. Activities that might affect the validity of data collected at hydro-meteorological data sites will be coordinated with the permittee or cooperating agency before implementation of the project.	Not applicable
10. Applications for hydropower, water diversion, water storage, or other water-related facilities will be evaluated on a case-by-case basis. The applicant may be required to use private consultants or other personnel to make environmental studies needed by the Forest Service and/or state agencies for evaluation of the proposal. Close coordination and cooperation with other agencies where appropriate will be sought.	Not applicable
11. Instream flows adequate to protect the aquatic environment will be maintained during any project which removes water from any stream.	Not applicable
Airshed Guidance	
1. Management activities that affect air quality will comply with Federal and state	This standard is not applicable to the Divide Travel Proposal. The

Standard	If Standard applies, how is standard being met
standards and the Montana Cooperative Smoke Management Plan. (The Plan is part of Fire Planning Records.)	resulting travel plan decision is an administrative action and does not authorize any type of fire suppression activities.
2. Protect air quality by cooperating with Montana Air Quality Bureau in the Prevention of Significant Deterioration (PSD) program and State Implementation Plan (SIP).	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any fire suppression activities.
Soil Guidance	
1. In accordance with NFMA, RPA, and Multiple Use-Sustained Yield Act, all management activities will be planned to sustain site productivity. During project analysis, ground disturbing activities will be reviewed and needed mitigating actions prescribed.	This standard does not apply to this project because no ground disturbing activities are proposed.
2. Areas of decomposed granite soils will be identified and erosion control measures planned prior to any ground disturbing activities.	This standard does not apply to this project because no ground disturbing activities are proposed.
3. To reduce sedimentation associated with management activities, the highly sensitive granitic soils, which cover about 20 percent of the Forest, will have first priority for soil erosion control.	This standard does not apply to this project because no ground disturbing activities are proposed.
Minerals General	
1. The 1964 Wilderness Act stipulates that effective December 31, 1983, no further mineral entry would be permitted in existing wilderness areas. This includes leasing for oil and gas, applying for patent on existing claims, and staking new claims. However, citizens' rights to enter public land for prospecting or working valid existing claims is unchanged.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
2. Areas withdrawn from mineral entry should be reevaluated every five years in accordance with Federal Land Policy and Management Act (FLPMA) to determine if the withdrawal is still necessary. (See Appendix Q.)	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize or evaluate mining operations.
3. Access for development of locatable and leasable minerals will be allowed on a case-by-case basis. Access should be directed toward minimizing resource impacts and be coordinated with other land uses.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Locatable Minerals	
1. Consistent with the Mining and Mineral Policy Act of 1970, continue to encourage the responsible development of mineral resources on National Forest lands. Concurrently, require mitigation measures to protect surface resources.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize or evaluate mining operations.
2. Provide guidance to miners and prospectors for planning reclamation and to minimize environmental damage.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not provide any type of guidance on mining operations.
3. Increase I&I efforts through publicizing the appropriate laws, regulations, and policies,	This standard is not applicable to the Divide Travel Proposal. The

Standard	If Standard applies, how is standard being met
to reduce cases of non-compliance from lack of knowledge of mining rules.	resulting travel plan decision is an administrative action and does not authorize mining operations.
4. Increase compliance inspections commensurate with mineral activities.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not provide guidance or oversight on mining activities.
5. When every reasonable attempt has failed to correct mining operations that are unnecessarily or unreasonably causing or threatening to cause irreparable injury, loss, or damage to surface resources, the Forest Service will seek judicial relief.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not provide oversight on correcting mining operation activities.
6. Maintain a liaison with local mining industry and mining associations. Cooperate with Federal and State agencies which administer mineral laws.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not provide mining administration guidance or oversight.
7. Following mineral development the Forest Service will require reclamation of surface disturbance to prevent or control on- and off-site damage. Reclamation includes, but is not limited to: a. Control of erosion and landslides. b. Control of water runoff. c. Isolation, removal, or control of toxic materials. d. Reshaping and re-vegetation of disturbed areas. e. Rehabilitation of fisheries and wildlife habitat.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mineral development, or reclamation guidance.
Saleable Minerals	
1. Common variety mineral permits will be considered on a case-by-case basis and will be issued only if consistent with the management area goals.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Leasable Minerals	
See ROD for Helena National Forest and Elkhorn Mountains Portion of the Deerlodge National Forest Oil and Gas Leasing EIS.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize oil and gas leasing.
Seismic Exploration	
1. An environmental analysis will be completed for each application. A prospecting permit will be issued on a case by case basis and will contain stipulations designed to coordinate surface resource values. The following apply where appropriate: a. Water quality and quantity: Stipulations may be issued to limit activities within 100 feet of all streams, lakes, springs, and ponds. b. Threatened and endangered species habitat: Stipulations will be issued to protect	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize seismic exploration.

Standard	If Standard applies, how is standard being met
threatened and endangered species by limiting activities during critical periods, and protecting important habitat elements. c. Nongame habitat: Stipulations may be used to limit surface use as a coordination and/or mitigation measure for species listed in State of Montana, Species of Special Interest and Concern. (The State species list is part of the Wildlife Planning Records.) d. Big game habitat: To protect key areas for big game (i.e., winter range, summer concentration habitats, calving areas, lambing areas, big game travel routes, etc.), stipulations may be used during critical periods. e. Archeological and Historic Resources: Proposed seismic survey work which may impact identified cultural and paleontological resources will be required to skip portions of the work or to relocate survey lines around known resource areas. Other resource threatening work will be required to fully comply with the Antiquities Act of 1906 and other related Acts pertaining to cultural resources. f. Special Uses, Leases, and Permits: To protect authorized special uses, leases, and permits, include stipulations to restrict occupancy by timing and location on a case-by-case basis. g. Fire: Seismic work during periods of high fire danger may not be allowed. To prevent wildfire, stipulations may be included to restrict timing and location of seismic operations. Stipulations may also be used to specify procedures and fire fighting equipment required by seismic crews. h. Land Stability and Erosion: Surface occupancy stipulations may be used to prohibit occupancy on lands subject to mass wasting and on slopes 60 percent and greater. i. Recreation: To accommodate concentrated recreational areas (i.e., picnic grounds and campgrounds), stipulations may be used to restrict seismic activities by location and timing.	
Land Uses	
1. Approve special use permits only when they comply with the goals of the management area affected. Appendix O provides guidelines for special uses and subdivisions.	Generally this is not applicable to the Divide Travel plan analysis. However, when new applications are received, they will comply with goals of affected Management Area and the Guidelines identified in Appendix O.
2. Enhance resource management by working with other agencies and landowners to develop and achieve common resource objectives.	This is not applicable to the Divide Travel plan
3. The Forest will encourage governing entities to proceed with land use planning and zoning prior to subdivision development on lands adjacent to or within the Forest boundary.	This is not applicable to the Divide Travel plan as there are currently no subdivisions proposed in this area.
4. Developers should provide for all necessary services within the limits of the subdivision	This is not applicable to the Divide Travel Plan analysis for the

Standard	If Standard applies, how is standard being met
without infringing on adjacent National Forest lands. But National Forest lands adjacent to subdivisions can be used for services associated with primary access and/or primary utility corridors if these services cannot reasonably be incorporated within the subdivision, or on other adjacent or nearby properties not administered by the Forest Service.	reasons stated in number 3 above.
5. The Forest Service will attempt to inform non-Federal landowners and land developers adjacent to the Forest of the management direction on the Forest land.	Non-federal landowners within and adjacent to the Forest have been included in the scoping effort of the Divide Travel Plan analysis and will they be kept informed throughout the process.
6. Adjacent private lands will not preclude multiple use management of lands administered by the Forest Service. But management of Forest Service land will be modified where appropriate and necessary to complement land uses on adjacent non-Federal property.	Existing access across the Forest to adjacent non-federal lands will be maintained when there is no reasonable alternative access across other lands through the Divide Travel Plan analysis.
7. When an environmental analysis for a proposed Forest project indicates that activities on adjacent land will require Forest Service management activities to be restricted to protect soil, water, and wildlife resources, the necessary restrictions will be determined. If no activity on Forest land is possible, the desired management will be scheduled for later decades when sufficient recovery has occurred on adjacent lands to permit the proposed activities on Forest Service land to continue. Exceptions to this policy will be considered on a case-by-case basis, when deferring management would result in adverse impacts to other Forest resources.	This is not applicable to the Divide Travel Plan analysis.
Landownership Adjustment	
1. A landownership adjustment schedule for the Helena Forest will be developed using the following criteria: a. The priority for acquisition will be for lands with assessed high wildlife, recreation, and watershed values. Acquisition may entail purchase or donation of fee simple or partial interests, such as conservation and scenic easements, or exchange procedures. b. Emphasize acquisition of land and interests in land to allow access to all Helena National Forest lands. c. Emphasize acquisition of trailhead facilities and trail rights-of-ways, especially to wilderness and dispersed recreation areas. d. Consider disposal of tracts where past patenting has resulted in isolated, intermingled National Forest ownerships, such as at York, Rimini, and Unionville.	The Lands/Rights-of-Way Background Report contains an inventory of rights-of-way interests to pursue, by priority, with the objective being to improve access to Helena National Forest lands.
Administration Facilities	
1. Provide a cost effective program of maintenance to necessary administrative facilities. This will protect the investment, provide for public and employee's health and safety in	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does

Standard	If Standard applies, how is standard being met
accordance with current building codes and standards, and present a neat, well kept appearance in harmony with its surroundings.	not authorize any maintenance to administrative facilities.
2. Construct new administrative facilities to replace existing structures that are no longer cost effective to maintain or expand or are inadequate to serve the needs of resource management.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any construction or expansion of facilities or structures.
Roads	
1. Road construction and reconstruction will be the minimum density, cost, and standard necessary for the intended need, user safety, and resource protection.	1. None of the Alternatives involve road construction or reconstruction
2. Forest development roads will not be constructed without an approved Area Transportation Analysis. Other road construction will be evaluated on a case-by-case basis.	2. None of the Alternatives involve road construction or reconstruction
3. Forest Specialists representing soils, watershed, and fisheries shall identify potential soil erosion, water quality and fisheries problems and provide input to the development of road design standards. Mitigating measures which will be considered in developing these standards include but not limited to: a. Reestablishing vegetation on exposed soils. b. Protecting the road surface through surface stabilization techniques such as dust oil or gravel, especially on decomposed granitic soils. c. Preventing downslope movement of sediment with the use of slash windrows below the fill slopes near stream crossings, baled straw in ditches and catch basins at culvert inlets. d. Reducing soil disturbance in or near streams by diverting clear water around culvert installation sites, especially in important fisheries streams. e. Controlling the concentration of water flow by insloping, outsloping and using minimum grades at stream crossings.	3. No construction or reconstruction would be done as part of any alternative. Maintenance would continue as part of all alternatives. Where roads are closed, appropriate measures would be taken to ensure proper drainage is maintained. In future decisions, the level and type of road decommissioning would be considered.
4. Short term local roads will be used for one time road access needs.	4. No new construction would be done as part of any alternatives
5. Coordinate transportation planning and road management with State and local agencies and owners of intermingled land.	5. The Forest is in the process of obtaining the necessary easements or already has them in place. Obtaining easements is outside the scope of this project.
Road Management	
1. The Helena National Forest will generally be open to vehicles except for roads, trails, or areas which may be restricted. (See Forest Visitor Map for specific information.) The Forest Road Management Program will be used to review, evaluate, and implement the	1. Alternatives 2, 3 and 4 would increase the miles of road open to over-snow motorized vehicles during the winter months (12/2 – 5/15). These routes are located in areas that are currently open to

Standard	If Standard applies, how is standard being met
goals and standards of the management areas in the Forest Plan with regard to road, trail, and area wide motorized vehicle use.	over-snow motorized use.
2. Road management decisions will be based on user needs, public safety, resource protection, and economics. Most existing roads will be left open. But most new roads will be closed, at least during critical periods for big game. The criteria to be used for road, trail, or area restrictions are as follows: a. Safety - Restrictions may be necessary to provide for safety of Forest users. b. Resource Protection - Unacceptable damage to soils, watershed, fish, wildlife, or historical/archaeological sites will be mitigated by road restrictions or other road management actions as necessary. Restrictions for wildlife reasons will be coordinated with the MDFWP. c. Economics - Restrictions will be considered if maintenance costs exceed benefits. d. Conflicting Use - Conflicts between user groups (especially motorized vs. non-motorized) may require restrictions. e. Facility Protection - Restrictions may be necessary to prevent damage to administrative sites, special use facilities, or other improvements. f. Public Support - Public concern may necessitate restricting or opening some roads, trails, or areas. g. Management Objectives - Road management will be used to achieve land management objectives.	2. a. There would not be any significant changes to user safety. The major changes would involve opening roads up to access by over-snow motorized vehicles. Since these roads are currently closed to other types of motorized use there is would not be any change to safety. (Motorized Mixed use routes for non-street legal vehicles would be evaluated on a case by case basis.) b. There would be a reduction of damage to soils in alternatives 2, 3 and 4 resulting from the additional road closures. c. There would not be any significant changes to economics in any of the alternatives d. Conflicts between user groups would be evaluated on a case by case basis e. Facility Protection - Not applicable f. Public Support-There may be concerns generated by increasing over-snow vehicle access to certain areas. g. Management Objectives-All four alternatives address this issue by continuing to provide strong stewardship of the land while allowing the public to access forest land.
3. The travel restrictions will be reviewed annually and revised as necessary to meet the goals and objectives of the Forest Plan.	3. Travel Restriction will be evaluated annually
4. Enforcement of the Road Management Program will be a high priority. Weekend patrolling, signing, gating, obliterating unnecessary roads, and public education will be used to improve enforcement. Enforcement will be coordinated with the MDFWP and other State and local agencies.	4. Initially increased enforcement activity would be necessary to educate the public regarding the road restrictions for each of the alternatives. Upon completion of this phase of the travel planning effort would result in a Motor Vehicle Use Map (MVUM). Production of a MVUM would occur annually and would assist in educating the public on travel within the Divide Travel Planning Area.
Road Maintenance	
1. Roads will be maintained in accordance with direction provided in FSH 7709.15 (Transportation System Maintenance Handbook) and will be at a level commensurate with the need for the following operational objectives: resource protection, road investment protection, user safety, user comfort, and travel efficiency.	1. Maintenance dollars are dispersed annually based on evaluation and needs. Annual road maintenance funding is limited and is insufficient to cover the entire amount of road maintenance required to a suitable standard. As a result, the Forest maintains roads based on Forest-wide priorities taking areas in need of resource

Standard	If Standard applies, how is standard being met
	protection into consideration.
2. Assigned maintenance levels will be reviewed annually and revised if management objectives change.	2. Maintenance levels are constantly evaluated for appropriateness.
3. A Forest Road Maintenance Schedule will be prepared annually and be responsive to the long term needs of the Forest Transportation System.	3. The Forest prepares a maintenance schedule annually. Project packets are also prepared in advance in the event additional funding becomes available.
4. Forest specialists representing soils and watershed shall provide input to the road maintenance planning process to verify maintenance standards, identify rehabilitation needs, and designate roads which should be permanently closed for resource protection. Specialists will annually submit capital investment project proposals for major road reconstruction needs.	4. On-going cooperative efforts between Forest resource specialists enables road and trail maintenance standards to be achieved in addition to ensuring resource protection.
Trails	
1. Trail management, such as trail standards, maintenance schedules, funding, trail use, construction, and reconstruction, will follow the guidance in Trails Management Handbook, FSH 2309.18.	This standard is not applicable to the Divide Travel Proposal. The resulting travel decision will not establish new trail standards.
2. Generally, trail maintenance work priorities will be established as follows: a. Priority 1. Activities to correct unsafe conditions relative to management objectives. b. Priority 2. Activities to minimize unacceptable resource and trail damage. c. Priority 3. Activities that restore the trail to planned design standards.	This standard is not applicable to the Divide Travel Proposal.
3. Trail construction/reconstruction will be designed and accomplished to be compatible with the recreation settings and management area goals.	This standard is not applicable to the Divide Travel Proposal.
4. Trails may be abandoned or rerouted when a road changes the character of the trail or when the maintenance cost exceeds the benefit.	This standard is not applicable to the Divide Travel Proposal.
Protection - Insect and Disease	
1. Silvicultural systems will be the primary tool for preventative pest management. Use silvicultural systems to: (1) improve species diversity, growth, and vigor for stands and (2) increase the size diversity and class diversity between stands.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any preventative pest management for silvicultural systems.
2. During ongoing infestations, control insects and disease through silvicultural and biological practices. Chemical controls will be limited to high value areas or used on a broader scale only when all other measures have failed and other resource values can be protected. Emphasize cooperative control measures between Federal, State, and private landowners.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not prescribe any type of insect and disease controls.

Standard	If Standard applies, how is standard being met
3. Biological practices will be considered in controlling insect and disease infestations.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not prescribe any type of insect and disease controls.
4. If possible, harvest stands which are a high risk for mountain pine beetle attack before harvesting moderate or low risk stands.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest.
Protection - Wildfire	
1. The appropriate suppression response(s) is discussed by management area. See Table I in Appendix R, Fire Management, for suppression summaries.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize fire suppression activities.
2. Locate timber sales, or cutting units within a sale, to break-up contiguous natural fuel.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest activities.
Protection - Law Enforcement	
1. Law enforcement agreements will be maintained with cooperating counties.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not affect current or future law enforcement agreements and/or cooperative efforts with counties.
2. Each Ranger District should maintain at least one employee qualified in advanced law enforcement (Level III).	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not affect law enforcement personnel positions on the Forest.
3. Across the Forest, two full-range law enforcement positions (Level IV) should be maintained.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not affect law enforcement personnel positions on the Forest.
Prescribed Fire – General	
1. A burning schedule and specific objectives should be completed for each project.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.
2. The burning prescription should be plant specific (i.e., burning may set back such species as bitterbrush and Idaho or rough fescue, if done with insufficient soil moisture or when "greening up").	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.
3. Prescribed burning should not exceed the natural fire frequency of the Fire Group.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.

Standard	If Standard applies, how is standard being met
4. Use prescribed fire only during periods of adequate smoke dispersal and in areas where water quality can be adequately maintained.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.
5. The Helena National Forest Soil Survey will be used to assist with individual site selection, to avoid potential soil and/or watershed degradation.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.
6. Smoke sensitive areas will be identified and burning prescriptions developed accordingly.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.
7. The MDFWP should be invited to participate in selecting treatment sites, executing burning plans, and monitoring and evaluating the overall program.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.
Prescribed Fire - Timber	
1. Where timber production is a primary land use, prescribed burning will only be applied where timber production can be maintained or enhanced by burning.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.
2. Prescribed fire, when used as a fuels management or site preparation technique after harvest, should be coordinated with the timber stand's silvicultural prescription.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.
Prescribed Fire - Range and Wildlife	
1. Areas that have a demonstrated need to maintain or increase forage because of conifer encroachment, shrub invasion, and imbalance in forb/grass ratios, and/or where grass and shrubs are deteriorating should be recommended for prescribed burning.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.
2. Where livestock and wildlife share sagebrush areas, prescribed fire will be designed to produce a mosaic of burned and unburned islands.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.
3. Just prior to and following a prescribed burn on grassland, livestock use should be withheld to ensure that adequate fine fuels are available for burning and to prevent overuse of new growth.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any prescribed fire activities.
Riparian	
1. Riparian areas will be delineated prior to implementing any management activities. Riparian areas include: a. Aquatic ecosystems (water, streambed, banks)	This decision does not authorize any new ground-disturbing activities and would not directly result in any impacts to riparian areas beyond existing conditions.

Standard	If Standard applies, how is standard being met
b. Floodplains c. Riparian ecosystems (area dominated by riparian vegetation) d. One hundred feet from edges of all perennial streams, lakes, and other water bodies, including a, b, and c above.	
2. Discourage concentrated use, such as campsites and roads, in riparian areas. Close wet meadows and wet areas to non-snow ORVs.	Dispersed campsites along the Little Blackfoot River are in need of modification or relocation, consistent with INFISH standards for recreation management.
3. Identify, prioritize, and develop riparian area rehabilitation projects by watershed.	This decision does not authorize any new ground-disturbing activities. Rehabilitation projects stemming from this decision will be addressed in future NEPA analysis.
4. Roads should not be constructed in the riparian area except to cross them. Use the appropriate soil and water conservation practices to minimize sedimentation during instream construction activities and include them in road construction contracts.	This standard does not apply to the decision, as it does not authorize any new ground-disturbing activities.
5. Assure that road construction in riparian areas is substantially completed or winterized during winter shut down to minimize peak flow sediment yield during spring thaw.	This standard does not apply to the decision, as it does not authorize any new ground-disturbing activities.
6. Generally, avoid lateral fills within normal high water marks.	This standard does not apply to the decision, as it does not authorize any new ground-disturbing activities. Rehabilitation projects stemming from this decision will be addressed in future NEPA analysis.
7. Generally, avoid stream course encroachment and channelization.	This standard does not apply to the decision, as it does not authorize any new ground-disturbing activities. Rehabilitation projects stemming from this decision will be addressed in future NEPA analysis.
8. Use of chemicals within the riparian area will be minimized to the extent feasible, will be coordinated with wildlife, watershed, and fisheries personnel and a certified pesticide applicator.	The resulting travel decision will comply with this standard.
9. Riparian areas will be managed to be compatible with dependent wildlife species.	This standard does not apply to this decision.
10. The timing and type of machinery used in riparian areas should be planned to minimize site damage.	This standard does not apply to the decision, as it does not authorize any new ground-disturbing activities.
11. Provide vegetative cover adjacent to streams to serve as a filter strip for sediment and maintain optimum water temperatures, as well as provide large debris for long-term instream fish cover and pooling. Where vegetative manipulation is possible, the activities will strive to achieve a balance of age classes and desired species composition.	This standard does not apply to the decision, as it does not authorize any new ground-disturbing activities.
12. Provide for stream crossing structure design that allows free water flow and fish	This standard does not apply to the decision, as it does not

Standard	If Standard applies, how is standard being met
passage.	authorize any new ground-disturbing activities.
13. Emphasize off-stream watering in range allotments to prevent damage to the riparian area.	This standard does not apply to this decision.
14. Livestock grazing in riparian areas will be controlled at the following levels of utilization:	The resulting travel decision will comply with this standard.

Vegetative Type	Grazing Systems	Vegetative Condition Class	Forage Utilization by Weight	Browse Utilization by % of Leader Use
Grasslands/ Grass-like/Forb	Continuous	Good	5%	N.A.
		Fair	5%	N.A.
		Poor	20%	N.A.
	Rest-Rotation	Heavy Use Pasture 1/	60%	N.A.
		Light Use Pasture	5%	N.A.
	Defer-Rotation	Heavy Use Pasture	50%	N.A.
		Light Use Pasture	40%	N.A.
Willow/ Grass/ Grass-like and Willow/ Forest	Continuous	Good	55%	50%
		Fair	5%	50%
		Poor	5%	50%
	Rest-Rotation	Heavy Use Pasture 2/	70%	50%
		Light Use Pasture	50%	50%
	Defer-Rotation	Heavy Use Pasture	60%	50%
		Light Use Pasture	5	50%

[1] Trampled areas and streambank damage caused during heavy use year should be

Standard	If Standard applies, how is standard being met
healed or stabilized with the following year. 2/ Disturbance on heavy use pasture should be stabilized or healed prior to use the following year.	

Table 2 - Management Area Direction and Acres

Management Standards	If Standard applies, how is standard being met
Management Area M-1 (183,500 acres)	
Description: These areas are non-forest and forested land where timber management and range or wildlife habitat improvements are currently uneconomical or environmentally infeasible. The area is scattered throughout the Forest and is found at all elevations and slopes ranging from 10 percent to over 60 percent. The parcels range in size from 20 to 500 acres.	**Management Goal** - Maintain the present condition with minimal investment for resource activities, while protecting the basic soil, water, and wildlife resources.
Recreation - Dispersed recreation can be supported by constructing trails, trailhead facilities, and sanitation facilities.	The resulting travel decision would comply with this standard.
Visual - Because of the lack of activity, the general visual quality objective (VQO) is retention. Less restrictive VQOs may be considered on a case-by-case basis, if project level planning on an adjacent management area affects a M-1 management area. [See Forest Landscape Management Book, Vol. 2 (Ag. Hdbk. No. 462) for definitions of VQOs and how they are applied.]	The resulting travel decision would comply with this standard.
Wildlife and Fisheries - Management practices to maintain or improve wildlife habitat will be permitted where necessary to meet the objectives of adjacent management areas.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action.
Range - Livestock use may remain at the 1983 level if the area is within existing allotments. Maintain range improvements and build new improvements, if they are needed to facilitate management of adjacent areas.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
Timber - Timber harvest, such as salvage and firewood removal, may occur where access exists. Slash created by any management practice will be disposed of in a manner consistent with the management area goals. Forested lands are classified as unsuitable for timber management.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Facilities - Roads will be allowed for special uses, mineral development, or to provide access to other management areas, consistent with protection of soil and water values. Roads may be opened or closed, depending on the objectives of the adjacent management areas. Existing roads and trails will be maintained as needed.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any special use permits, new road or trail construction, improvements, or maintenance.
Minerals – See Forest Plan Amendment #13 for lease standards.	
Protection - Salvage of dead, dying, or high-hazard trees is permitted to prevent disease and insect population build-up. The appropriate fire suppression response ranges from control to confinement depending upon location, expected fire behavior, and other decision criteria	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.

Management Standards	If Standard applies, how is standard being met
related to values at risk. These criteria are stated in the Fire Management Direction in Appendix R. Prescribed fire with planned ignitions may be used in this management area, for the enhancement and maintenance of resources. Prescribed fire with unplanned ignitions may be used in this management area, for the enhancement and maintenance of resources, when within pre-established prescribed fire criteria. These criteria are stated in the Fire Management Direction in Appendix R. Evaluate areas periodically for significant insect and disease problems. Endemic levels will be accepted as normal. If epidemic levels develop and control is necessary, the control method should minimize impacts on watershed and other resource values.	
Management Area L-1 (78,700 acres)	
Description: These lands are within grazing allotments and are generally non-forested consisting of bunchgrasses, sage and other shrubs or sparsely forested areas with Douglas fir or ponderosa pine as the dominant species. Slopes vary from 10 percent to greater than 60. This management area contains inclusions of elk calving areas, hiding cover, and summer range, but excludes identified elk winter range.	**Management Goals -** Maintain or improve vegetative conditions and livestock forage productivity. Optimize livestock production through intensive grazing systems, while maintaining other resource uses.
Recreation - Motorized and non-motorized dispersed recreation activities are permitted and may be encouraged by constructing or maintaining trails and trailhead facilities. Existing trails and facilities will be maintained, unless they are no longer needed. Controls on motorized recreation will be implemented where necessary to protect the vegetation, soil, water, and wildlife resources and to prevent road damage.	The resulting travel decision would comply with this standard.
Visual - Management practices will generally follow guidelines for the maximum modification VQO. The portions of this area (if any) that are within the sensitive viewing areas of the roads, trails, and areas listed in Appendix B will be managed to meet the more restrictive VQOs noted in the appendix. [See Forest Landscape Management Book, Vol. 2 (Ag. Hdbk. No. 462) for definitions of VQOs and how they are applied.]	This standard is not applicable to the Divide Travel Proposal.
Wildlife and Fisheries - Specific wildlife and fisheries needs will be identified and considered when developing allotment management plans, provided the needs are compatible with area goals. Habitat improvement projects will be scheduled when they would help achieve	This standard is not applicable to the Divide Travel Proposal. This travel plan project is an administrative decision to open or close roads and does not authorize any ground disturbance.

Management Standards	If Standard applies, how is standard being met
the area goals.	
Range - Livestock grazing will generally be maintained at or above 1983 levels, unless a range analysis or monitoring indicates there is a need to change. Vacant allotments will be restocked if a range analysis shows it to be feasible and a demand exists for additional AUMs. Intensive management systems will be implemented, where cost-effective, to sustain forage production. Management systems will be designed to minimize conflicts with wildlife. Forage improvement projects such as sagebrush burning, tree encroachment burning, and noxious plant control will be carried out on a scheduled basis. The schedule will be developed as part of the allotment management plans. Improvements, such as cattle guards, fences, and watering facilities, will be maintained and reconstructed as needed to continue present levels of grazing. New improvements may be constructed if the need is identified in an approved allotment management plan.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
Timber - Timber harvest may be used as a tool to improve forage production. However, forested land is classified as unsuitable for timber management.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Water and Soils – See Forestwide Standards.	
Minerals -See Forest Plan Amendment #13 for lease standards.	
Lands – See Forestwide Standards.	
Facilities - Roads normally will not be constructed for range management activities, but may be constructed for other activities, such as mining, or to provide access to adjacent management areas. When an existing barrier is intersected, the necessary structures to prevent cattle drift (fences, gates, cattle guards, etc.) will be installed during road construction. - Where existing trails are intersected by new road construction, the trail will be evaluated to determine if it should be retained on the system or abandoned.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new road or trail construction or improvements.
Protection - Use prescribed fire as a tool to increase the quality and quantity of forage. The appropriate fire suppression response ranges from control to confinement depending upon location, expected fire behavior, and other decision logic criteria related to values at risk. These decision criteria are stated in the Fire	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.

Management Standards	If Standard applies, how is standard being met
Management Direction in Appendix R. Prescribed fire with planned ignitions will be used in this management area, for the enhancement and maintenance of resources. Prescribed fire with unplanned ignitions may be used in this management area, for the enhancement and maintenance of resources, when within pre-established prescribed fire criteria. These criteria are detailed in the Fire Management Direction in Appendix R.	
Riparian - See Forestwide Standards.	
Management Area L2 (15,200 acres)	
Description - This management area is land which is both identified big game winter range and within existing grazing allotments. The land is generally non-forest with bunchgrass, sage and other shrubs or sparsely forested areas of Douglas fir and ponderosa pine. The area is usually at lower elevations in the foothills and has slopes from 10 to 60 percent. The area provides thermal and hiding cover on identified winter range.	**Management Goals -** Maintain or improve range vegetative conditions and forage production for livestock and elk.
Recreation - Motorized access will be prohibited or limited to designated routes during wintering periods, generally from December 1 to May 15. Non-motorized dispersed recreation may be supported by constructing trails and trailhead facilities when compatible with area goals.	The resulting travel decision would comply with this standard.
Visual - Management practices will generally follow the guidelines for the modification VQO. The portions of this area (if any) that are within the sensitive viewing areas of the roads, trails, and areas listed in Appendix B will be managed to meet the more restrictive VQOs noted in the appendix [See Forest Landscape Management Book, Vol. 2 (Ag. Hdbk. No. 462) for definitions of VQOs and how they are applied].	This standard is not applicable to the Divide Travel Proposal.
Wildlife and Fisheries - Wildlife habitat improvement practices, including road management, prescribed fire, and other techniques, may be used to maintain and/or enhance the quality of big game winter range. Projects will be coordinated for livestock and big game needs. Maintain adequate thermal and hiding cover adjacent to forage areas. Generally this means providing at least 25 percent thermal cover, where available, on identified winter range.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any ground disturbance.
Range - Livestock grazing will be maintained at the 1983 level, however, the level may be increased or decreased if monitoring or range analysis shows a need or opportunity to change. Chemical or mechanical control of invading vegetation should be considered only if needed to improve or maintain forage production. - Forage improvement projects, such as sagebrush burning, tree	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.

Management Standards	If Standard applies, how is standard being met
encroachment burning, and noxious plant control, will be carried out on a scheduled basis. The schedule will be developed as part of the allotment management plans and in coordination with a wildlife biologist. When an existing barrier is intersected by structural improvements, such as cattle guards, fences, and watering facilities, will be maintained or reconstructed as needed to continue present levels of grazing. New improvements will be constructed if the need is identified in an approved allotment management plan.	
Timber - Timber harvest may be used as a tool to improve forage production. However, forested land is classified as unsuitable for timber management.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Water and Soil – See Forest-Wide standards.	
Minerals - Locatable—To the extent feasible, timing of mineral activities will be coordinated with the needs of wildlife on winter range. This generally will require negotiations during development of operating plans for no surface activity from December 1 to May 15. See Forest Plan Amendment #13 for lease standards.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Lands – See Forest-Wide Standards.	
Facilities - Roads normally will not be constructed for range or wildlife management activities, but may be constructed for other activities, such as mining, or to provide access to adjacent management areas. The necessary structures to prevent cattle drift (fences, gates, cattle guards, etc.) will be installed during road construction.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new road or trail construction or improvements.
Protection - Evaluate areas periodically for significant insect and disease problems. Endemic levels will be accepted as normal. If epidemic levels develop and control is necessary, the control method should minimize impacts on big game and other wildlife values. The appropriate fire suppression response ranges from control to confinement depending upon location, expected fire behavior, and other decision logic criteria related to values at risk. These decision criteria are stated in the Fire Management Direction in Appendix R. Prescribed fire with unplanned ignitions may be used in this management area, for the enhancement and maintenance of resources, when within pre-established prescribed fire criteria. These criteria are detailed in the Fire Management Direction in Appendix R. Prescribed fire may be used as a tool to reduce fuels and increase the productivity of forage for wildlife and livestock.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.
Riparian – See Forest-Wide Standards.	

Management Standards	If Standard applies, how is standard being met
Management Area H1 (15,100 acres)	
Description - This management area consists of about 75% of the National Forest Land in the Tenmile municipal watershed which lies about 10 air miles southwest of Helena. The entire watershed currently supplies about one half of Helena's domestic water. About 25 percent of this watershed management area is in private ownership, consisting mostly of patented mining claims. Some of these mines are currently active. The town of Rimini also lies within this management area. Vegetative cover varies from dense lodgepole and brush on north and east slopes to open scattered Douglas-fir and ponderosa pine on south and west slopes. This area provides a variety of recreational opportunities as will as habitat for wildlife. This management area contains trail segments that will likely be proposed as part of the Continental Divide National Scenic Trail System.	**Management Goals -** Provide a quantity and quality of water which will, with adequate treatment, result in a satisfactory and safe domestic water supply for the City of Helena. Provide cover and forage for big game animals and necessary habitat components for nongame animals. Provide for dispersed recreation opportunities.
Recreation – Non-motorized dispersed recreation will continue within the drainage; however no additional facilities will be constructed to support the use. Developed recreation facilities will not be constructed.	This standard is not applicable to the Divide Travel Proposal.
Visual – Management practices will generally follow guidelines for the modification VQO. The portions of this area (if any) that are within the sensitive viewing areas of the roads, trails, and areas listed in Appendix B will be managed to meet the VQOs noted in the appendix. [See Forest Landscape Management Book, vol. 2 (Ag. Hdbk. No. 462) for definitions of VQOs and how they are applied.]	This standard is not applicable to the Divide Travel Proposal.
Wildlife and Fisheries – Wildlife habitat improvement practices, including road management, prescribed fire, and other techniques, will be used to maintain and/or enhance the diversity of wildlife habitat. Maintain adequate thermal and hiding cover adjacent to forage areas as determined by a wildlife biologist. Generally this means providing at least 25 percent thermal cover, on identified winter range.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any improvements or ground disturbance.
Range – The area grazed and the number of AUMs permitted in the watershed will not be increased. However, if livestock grazing decreases the water quality, then the grazing practices will be changed to maintain the water quality.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
Timber – Timber harvest should be implemented only if it can be used as a tool to maintain or enhance watershed and wildlife habitat values. Forested land is classified as unsuitable for timber management.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.

Management Standards	If Standard applies, how is standard being met
Water and Soils – Watershed improvement needs have been inventoried in the Tenmile watershed and priority projects identified. The drainage has the top priority for implementation of watershed improvement projects as funding becomes available. (See Appendix T).	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Minerals – Locatable – To the extent feasible, timing of mineral activities will be coordinated with the needs of wildlife and water quality standards. This generally will require negotiations during development of operating plans for no surface occupancy, from December 1 to May 15 on winter range and during peak runoff. -Leasable - See Forest Plan Amendment #13 for lease standards	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Lands – This management area is an avoidance area for utility corridors (see Appendix P).	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any additional, or changes to, utility corridors.
Facilities - Roads will be constructed as needed to meet the management objectives of the area. Minimizing road length, grade and amount of disturbed area will be primary project design criteria. Portions of existing roads that are reconstructed will be maintained at a standard that will prevent unacceptable erosion or will be closed and stabilized. All new roads will be closed and stabilized when projects are terminated.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new road or trail construction or improvements.
Protection – Evaluate areas periodically for significant insect and disease problems. Endemic levels will be accepted as normal. If epidemic levels develop and control is necessary, the control method should minimize impacts on watershed and wildlife values. Use rapid and aggressive fire control methods in this management area. Prescribed fire may be used as a tool to reduce natural fuels and improve quantity and quality of wildlife forage. Fire suppression methods will be selected to minimize or eliminate soil disturbance of the watershed.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.
Riparian – See Forest-Wide Standards.	
Management Area H2 (4,500 acres)	
Description - This management area consists of about 25% of the Tenmile Municipal watershed with lies about 10 air miles south west of Helena. The entire watershed supplies about one half of Helena's domestic water. This management area contains parcels of productive timber stands of lodgepole pine and Douglas-fir. These parcels are found in Tenmile, Minnehaha, and Walker Creeks on the west side of the watershed and in Beaver and Banner Creek on the east side. This area provides winter and summer habitat for a	**Management Goals -** Provide a quantity and quality of water which will, with adequate treatment, result in a satisfactory and safe domestic water supply for the City of Helena. Provide cover and forage for big game animals and necessary habitat components for nongame animals.

Management Standards	If Standard applies, how is standard being met
variety of wildlife species. This management area contains trail segments that will likely be proposed as part of the Continental Divide National Scenic Trail System.	Provide healthy timber stands and optimize growing potential over the planning horizon while protecting the soil and water resources. Provide for dispersed recreation opportunities.
Recreation – Non-motorized dispersed recreation will continue within the drainage, however no additional facilities will be constructed to support the use. Developed recreation facilities will not be constructed. Controls on motorized recreation will be implemented where necessary, to protect the vegetation, soil, and water resources and to prevent road damage.	This standard is not applicable to the Divide Travel Proposal.
Visual – Management practices will generally follow guidelines for the modification VQO. The portions of this area (if any) that are within the sensitive viewing areas of the roads, trails, and areas listed in Appendix B will be managed to meet the VQOs noted in the appendix. [See Forest Landscape Management Book, Vol. 2 (Ag. Hdbk. No. 462) for definitions of VQOs and how they are applied.]	This standard is not applicable to the Divide Travel Proposal.
Wildlife and Fisheries – Wildlife habitat improvement practices, including road management, prescribed fire, and other techniques, will be used to maintain and/or enhance the diversity of wildlife habitat. Forest-wide Standards and Appendix D contain guidance for T&E species habitat. Maintain adequate thermal and hiding cover adjacent to forage areas as determined by a wildlife biologist. Generally this means providing at least 25 percent thermal cover on identified winter range.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any improvements or ground disturbance.
Range – See Forest-Wide Standards	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
Timber - This management area is suitable for timber management activities. Timber harvest practices include clearcuting, group selection, and shelterwood harvest, depending on habitat group, physical site conditions, and silvicultural objectives. Pre-commercial thinning and intermediate harvest may occur where needed as determined by silvicultural objectives and project planning. (Appendices H and M provide broad guidelines for various habitat groups.) As a minimum, a cutover area will not be considered an opening when: (1) a new forest stand is established and certified as stocked (2) vegetative conditions reach the point where harvest of additional timber can occur and the combined area can still meet watershed management objectives.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.

Management Standards	If Standard applies, how is standard being met
Prescribed burning or other techniques may be used for slash disposal, site preparation, and silvicultural objectives. In habitat groups where fire is not a useful treatment tool, lopping and scattering, yarding un-merchantable material (YUM), or other methods will be used to reduce fuel accumulations and prepare sites for regeneration. Project level planning will provide for stand regeneration within five years of final harvest. Even-aged stands will be scheduled for final regeneration harvest when they generally have reached the culmination of mean annual increment (CMAI) of growth. Exceptions include thinning or other stand improvement measures, salvage or sanitation harvest, management for experimental or research purposes and to meet other resource objectives. CMAI for primary species on the Helena National Forest is shown in Appendix H.	
Water and Soils – Watershed improvement needs have been inventoried in the Tenmile watershed and priority projects identified. The drainage has the top priority for implementation of watershed improvement projects as funding becomes available (See Appendix T). Timber harvest will not create runoff increases which are likely to result in stream channel degradation. All timber sale proposals will include an analysis of current conditions and potential sediment production. The project proposal will analyze and evaluate the potential water quantity and quality, and soil productivity impacts; mitigation measures will be developed to minimize adverse effects. If a proposal shows the water quality cannot be maintained, within State standards for A-1 watersheds and public water supplies the project will be redesigned to meet the standards or terminated. Water quality monitoring will be an integral part of all timber harvest proposals.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Minerals – Locatable – To the extent feasible, timing of mineral activities will be coordinated with the needs of wildlife and water quality standards. This generally will require negotiations during development of operating plans for no surface occupancy, from December 1 to May 15 on winter range and during peak runoff. All minerals operations will be closely monitored to insure that water quality standards are maintained. - Leasable See Forest Plan Amendment #13 for lease standards	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Lands – This management area is an avoidance area for utility corridors.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any additional, or changes to, utility corridors.
Facilities – Portions of existing roads that are reconstructed will be maintained at a standard that will prevent unacceptable erosion or will be closed and	This standard is not applicable to the Divide Travel Proposal. The resulting

Management Standards	If Standard applies, how is standard being met
stabilized. Roads will be constructed as needed to meet the management objectives of the area. Minimizing road width, grade and amount of disturbed area will be primary project design criteria. All new roads will be closed and stabilized when projects are terminated to minimize erosion. Where existing trails or non-system roads are intersected by new road construction, the trail or non-system road will be evaluated to determine if it should be retained on the system or abandoned.	travel plan decision is an administrative action and does not authorize any new road or trail construction or improvements.
Protection Insect and disease control should emphasize reduction and prevention through timber harvest and timber stand improvement. The use of other approved pest management techniques consistent with municipal watershed goals may be necessary at times. Use rapid and aggressive fire control methods in this management area. Prescribed fire may be used as a tool to reduce natural fuels and improve quantity and quality of wildlife forage. Fire suppression methods will be selected to minimize or eliminate soil disturbance of the watershed.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.
Riparian – Timber harvest will be on a 240 year rotation and harvest types will generally be selection or group selection.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Management Area R1 (34,300 acres)	
Description - This management area consists of large blocks – greater than 3,000 acres—of undeveloped land suited for dispersed recreation. These lands include Mount Helena, Trout Creek Canyon, Indian Meadows, Nevada Mountain, Camas Lakes, and Silver King/Falls Creek. The Silver King/Falls Creek area has been identified by the USGS as having a high potential for oil and gas. These areas provide opportunities for semi-primitive non-motorized recreation and are characterized predominately by natural or natural appearing environment where there is a high probability of isolation from man's activities.	**Management Goals -** Provide a variety of semi-primitive and primitive non-motorized recreation opportunities. Provide for maintenance and/or enhancement of fishery, big game, and nongame habitat, grazing allotments, visual quality, and water quality.
Recreation Motorized vehicles are not allowed in the management area. Exceptions may be allowed on a case-by-case basis where motorized vehicles are needed for legitimate mineral use. -Recreation facilities will be permitted to preserve or enhance dispersed recreation opportunities. Portals, shelters, toilets, trail signs, etc., may be	The resulting travel decision would comply with this standard.

Management Standards	If Standard applies, how is standard being met
constructed if a need is identified. Existing facilities may be maintained or reconstructed as needed to expand dispersed recreation opportunities. -Developed campgrounds will not be constructed in this area.	
Visual - Management practices will follow the guidelines for the retention VQO. Short term deviations may occur during construction or reconstruction of facilities or from management activities. [See Forest Landscape Management Book, Vol. 2 (Ag. Handbook, No. 462) for definitions of VQOs and how they are applied.]	This standard is not applicable to the Divide Travel Proposal.
Wildlife and Fisheries – Habitat improvement projects, such as prescribed fire and water developments, may be used to maintain or improve the fish and wildlife habitat, if the projects are compatible with the area's goals.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any improvements or ground disturbance.
Range - Livestock grazing will be maintained at the 1983 levels within existing allotments, however, the level may be increased or decreased if monitoring or range analysis shows a need or opportunity to change. Range improvements, such as salting, water developments, etc., may be implemented to disperse livestock use.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
Timber - Forested lands are classified as unsuitable for timber management.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Water and Soils – See Forestwide Standard.	
Minerals – Locatable – Maintain an unroaded environment to the extent practical under the mining laws and the Mining Act Use Regulations. Use of motorized vehicles and timing of mineral activities will be coordinated with dispersed recreation and wildlife needs during development of the operating plan. Leasable See Forest Plan Amendment #13 for lease standards	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Lands – This management area is an avoidance area for utility corridors (see Appendix P).	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any additional, or changes to, utility corridors.
Facilities – Roads will not be constructed for surface management purposes unless absolutely necessary for mineral activity or to access private land. -Trailhead facilities may be constructed to increase accessibility and enhance recreation opportunities.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new road or trail construction or improvements.
Protection - Evaluate areas periodically for significant insect and disease problems. Endemic levels will be accepted as normal. If epidemic levels develop and control is necessary, the control method should minimize impacts on the dispersed recreation values.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.

Management Standards	If Standard applies, how is standard being met
Wildfire suppression should minimize the use of heavy equipment. The appropriate fire suppression response ranges from control to confinement depending upon location, expected fire behavior, and other decision criteria related to values at risk. These decision criteria are stated in the Fire Management Direction in Appendix R. Prescribed fire with planned ignitions may be used in this management area, for the enhancement and maintenance of resources. Prescribed fire with unplanned ignitions may be used in this management area, for the enhancement and maintenance of resources, when within pre-established prescribed fire criteria. These criteria are detailed in the Fire Management Direction in Appendix R.	
Riparian – See Forest Wide Standards	
Management Area T1 (156,000 acres)	
Description - This management area consists of lands available and suitable for timber management with varying physical and biological environments as determined by soil, slope, aspect, elevation, and climatic factors. Vegetation varies from ponderosa pine on the drier sites to spruce in the more mesic sites with nearly all slopes and aspects represented. Although this area consists primarily of suitable forest land, there are inclusions of non-forest and nonproductive forest lands. This area includes some small ponds and marshes which are considered unique to this part of Montana.	**Management Goals -** Provide healthy timber stands and optimize timber growing potential over the planning horizon. Emphasize cost-effective timber production, while protecting the soil productivity. Maintain water quality and stream bank stability. Provide for dispersed recreation opportunities, wildlife habitat, and livestock use, when consistent with the timber management goals.
Recreation - Motorized and non-motorized dispersed recreation activities are permitted and may be supported by constructing or maintaining trails and trailhead facilities. Existing trails and facilities will be maintained unless they are no longer needed. - Controls on motorized recreation will be implemented where necessary, to protect the vegetation, soil, and water resources and to prevent road damage.	The resulting travel decision would comply with this standard.
Visual - Management practices will generally follow guidelines for the maximum modification VQO. The portions of this area (if any) that are within the sensitive viewing areas of the roads, trails, and areas listed in Appendix B will be managed to meet more restrictive VQOs noted in the appendix. [See Forest Management Book, Vol. 2 (Ag. Handbook, No. 462) for definitions of VQOs and how they are applied.]	This standard is not applicable to the Divide Travel Proposal
Wildlife and Fisheries - Wildlife and fisheries habitat improvement projects	This standard is not applicable to the Divide Travel Proposal. The resulting

Management Standards	If Standard applies, how is standard being met
may be implemented, provided they are compatible with the management area goals. Forest-Wide Standards and Appendix D contain guidance for T&E species habitat.	travel plan decision is an administrative action and does not authorize any new projects.
Range - Livestock grazing is compatible, except where it conflicts with stand establishment. Fencing, temporary herding, or other techniques may be used to protect regeneration where needed. Pasture and allotment boundaries should be maintained during and following timber harvest. This may require additional fencing, where natural barriers are breached by timber sale activities. Livestock grazing will be maintained at the 1983 levels within existing allotments, however, the level may be increased or decreased if monitoring or range analysis shows a need or opportunity to change.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
Timber - This management area is suitable for timber management activities. Timber harvest practices include clearcut, group selection, and shelterwood harvest, depending on habitat group, physical site conditions, and silvicultural objectives. Pre-commercial thinning and intermediate harvest may occur where needed as determined by silvicultural objectives and project planning. (Appendices H and M provide broad guidelines for various habitat groups.) As a minimum, a cutover area will not be considered an opening when: (1) a new forest stand is established and certified as stocked, and (2) vegetative conditions reach the point where harvest of additional timber can occur and the combined area can still meet watershed management objectives. Prescribed burning or other techniques may be used for slash disposal, site preparation, silvicultural, and livestock objectives. In habitat groups where fire is not a useful treatment tool, lopping and scattering, yarding un-merchantable material (YUM), or other methods will be used to reduce fuel accumulations and prepare sites for regeneration. Project level planning will provide for stand regeneration within five years of final harvest. Even-aged stands will be scheduled for final regeneration harvest when they generally have reached the culmination of mean annual increment (CMAI) of growth. Exceptions include thinning or other stand improvement measures, salvage or sanitation harvest, management for experimental or research purposes and to meet other resource objectives. CMAI for primary species on the Helena National Forest is shown in Appendix H.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Water and Soils Timber harvest will not create runoff increases which are likely to result in	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any

Management Standards	If Standard applies, how is standard being met
long term stream channel degradation. All timber sale proposals will include an analysis of the current and projected status of sediment produced. The project proposal will analyze and evaluate the potential water quantity and quality, and soil productivity impacts; mitigation measures should be developed to minimize adverse effects. If a proposal shows the water quality cannot be maintained, the project will be reevaluated or terminated.	timber harvest or ground disturbance.
Minerals – Locatable – See Forestwide Standards. Leasable See Forest Plan Amendment #13 for lease standards	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Lands – See Forest-Wide Standards	
Facilities - Roads will be constructed as needed to meet the management objectives of the area. Where existing trails are intersected by new road construction, the trail will be evaluated to determine if it should be retained on the system or abandoned.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new road or trail construction or improvements.
Protection Insect and disease control should emphasize reduction and prevention through timber harvest and timber stand improvement. The use of other approved integrated pest management techniques may be necessary at times. The appropriate fire suppression response ranges from control to containment depending upon location, expected fire behavior, and other decision logic criteria related to values at risk. These decision criteria are stated in the Fire Management Direction in Appendix R. Prescribed fire with planned ignitions may be used in this management area, for the enhancement and maintenance of resources. Fuel reduction methods for activity created fuels include burning, removing residue, or rearranging, such as dozer trampling.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.
Riparian - Generally, harvesting will only occur in riparian areas in conjunction with sale activity on adjacent lands. In riparian areas, any timber harvest should be on a 240 year rotation, and harvest types should be selection or group selection. See Forest Wide Standards for grazing in riparian. The small ponds and marshes in Section 15, 16, 21, and 22 of T8N, R6W PMM are unique to this part of Montana and will be protected in project design and implementation.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Management Area T3 (37,700 acres)	
Description - This management area consists of lands that have primary	**Management Goals -** Maintain and/or enhance habitat characteristics favored

Management Standards	If Standard applies, how is standard being met
forage, resting, and security characteristics that provide important spring and summer requirements for all big game species. These lands also supply the habitat needs of a wide variety of nongame forest dwelling wildlife. In addition lands within this management area contain productive timber sites that are available and suitable for timber management. The variation in elevation, topography, slope, and aspect, in addition to the often abundant surface water (seeps, springs, etc.), make these areas rich in species diversity and total numbers within species groups. This area also has inclusions of small grassland parks.	by elk and other big game species. Provide for healthy timber stands and a timber harvest program compatible with wildlife habitat goals for this area. Emphasize cost-effective timber production, while protecting the soil productivity. Maintain water quality and stream bank stability. Provide for other resource objectives where compatible with the big game summer range and timber goals.
Recreation - Controls over motorized dispersed recreation will be implemented where necessary to protect wildlife habitat values. Non-motorized dispersed recreation may be supported by constructing trails and trailhead facilities when compatible with management area goals.	The resulting travel decision would comply with this standard.
Visual - Management practices will generally follow guidelines for the modification VQO. The portions of this area (if any) that are within the sensitive viewing areas of the roads, trails, and areas listed in Appendix B will be managed to meet the more restrictive VQOs noted in the appendix. [See Forest Landscape Management Book, Vol. 2 (Ag. Hdbk. No. 462) for definitions of VQOs and how they are applied.]	This standard is not applicable to the Divide Travel Proposal
Wildlife and Fisheries - Maintain a minimum of 35 percent hiding cover for big game. Maintain thermal cover adjacent to forage areas. Appendix C provides guidance for thermal cover. Wildlife habitat improvement practices, including road management, prescribed fire, and timber harvest, may be used to maintain and/or enhance the quality of big game summer habitat.	This standard is not applicable to the Divide Travel proposal. Thermal and hiding covers are not affected.
Range - Livestock grazing will be maintained at the 1983 levels within existing allotments, however, the level may be increased or decreased if monitoring or range analysis show a need or opportunity to change. Grazing systems will be designed to be compatible with wildlife needs. Improvements for livestock management, such as fencing and water developments, will be implemented unless they are a detriment to big game.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
Timber - This management area is suitable for timber management activities. Timber harvest methods and volumes may be modified as necessary to achieve the management area goals. Even-aged stands will be scheduled for final regeneration harvest when they generally have reached the culmination of mean annual increment (CMAI) of growth. Exceptions include salvage or sanitation harvest and management for	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.

Management Standards	If Standard applies, how is standard being met
experimental or research purposes and to meet other resource objectives. CMAI for primary species on the Helena National Forest is shown in Appendix H. Appendix M provides guidance for various vegetative management practices by habitat group. Stocking control may be maintained through pre-commercial and commercial thinning. The timing and planning of thinning operations will be coordinated with a wildlife biologist. Vegetative diversity will be encouraged. Openings created by timber harvest will be reforested to the extent necessary to meet the hiding cover requirements of big game before harvesting adjacent areas.	
Water and Soils - Timber harvest will not create runoff increases which are likely to result in long term channel degradation. All timber sale proposals will include an analysis of the current and projected status of sediment produced. The project proposal will analyze and evaluate the potential water quantity and quality and soil productivity impacts; mitigation measures should be developed to minimize adverse effects. If a project proposal shows the water quality cannot be maintained, the project will be reevaluated or terminated.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Minerals - Locatable—To the extent feasible, timing of activities will be coordinated with the needs of wildlife on summer range. This will require negotiations during development of operating plans for minimum disturbance to wildlife. Leasable ---- See Forest Plan Amendment #13 for lease standards	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Lands – See Forest-Wide Standards	
Facilities - Roads will be constructed as needed to meet the management area goals. Where existing trails are intersected by new road construction, the trail will be evaluated to determine if it should be retained on the system or abandoned.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new road or trail construction or improvements.
Protection - Insect and disease control should emphasize reduction and prevention through timber harvest and timber stand improvement. The use of other approved integrated pest management techniques may be necessary at times. The appropriate fire suppression response ranges from control to containment depending upon location, expected fire behavior, and other decision criteria related to values at risk. These decision criteria are stated in the Fire Management Direction in Appendix R. Prescribed fire with planned ignitions may be used in this management area, for the enhancement and maintenance of resources. Fuel reduction methods for activity created fuels include burning, removing	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.

Management Standards	If Standard applies, how is standard being met
residue, or rearranging, such as dozer trampling. Disposal activities will meet visual quality objectives.	
Riparian - See Forest Wide Standards for grazing in riparian. Generally, harvesting will only occur in riparian areas if in conjunction with sale activity on adjacent lands. In riparian areas, any timber harvest should be on a 240 year rotation and harvest types should be selection or group selection.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Management Area T4 (10,100 acres)	
Description - This management area is productive timberland within the sensitive viewing area of many major travel routes, use areas, and water bodies. Vegetation varies from ponderosa pine, on the drier sites, to spruce in the moistest areas. Nearly all slopes and aspects are represented. Most of the area is suitable forest land, but there are some inclusions of non-forest and nonproductive forest land.	**Management Goals -** Maintain healthy stands of timber within the visual quality objective of retention and partial retention. Provide for other resource uses as long as they are compatible with visual quality objectives. Emphasize cost-effective timber production, while protecting the soil productivity. Maintain water quality and stream bank stability.
Recreation – Motorized and non-motorized dispersed recreation activities are permitted and may be supported by constructing or maintaining trails and trailhead facilities. Controls over motorized recreation will be implemented where necessary to protect resource values such as vegetation, soil, water, and VQOs.	The resulting travel decision would comply with this standard.
Visual – Management practices will generally follow guidelines for partial retention and retention depending upon the particular portion of the management area being entered. (Refer to Appendix B, Sensitive Viewing Areas, for most heavily used roads and recreation areas.) Departures from these VQOs will be considered on a case-by-case basis after an environmental analysis has been completed. [See Forest Landscape Management Book, Vol. 2 (Ag. Handbook. No. 462) for definitions of VQOs and how they are applied.]	This standard is not applicable to the Divide Travel Proposal.
Wildlife and Fisheries – Where elk habitat exists, project design will incorporate management practices to maintain or enhance summer and winter habitat to the extent that the VQOs for the area are met. -Wildlife and fisheries habitat improvement projects may be implemented provided they are compatible with the management area goals.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any type of improvements for fish and wildlife.
Range – Pasture and allotment boundaries should be maintained during and following timber harvest. This may require additional fencing where natural barriers are breached by timber sale activities. Livestock grazing will be maintained at the 1983 levels within existing	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.

Management Standards	If Standard applies, how is standard being met
allotments, however, the level may be increased or decreased if monitoring or range analysis show a need or opportunity to change.	
Timber - This management area is suitable for timber management activities. Even-aged stands may be scheduled for final regeneration harvest when they generally have reached the culmination of mean annual increment (CMAI) of growth. Exceptions include thinning or other stand improvement measures, salvage or sanitation harvest, and management for experimental or research purposes and to meet other resource objectives. CMAI for primary species on the Helena National Forest is shown in Appendix H. Timber harvest practices include clearcutting, group selection, and shelterwood harvest, depending on habitat group, physical site conditions, and visual quality objectives. Pre-commercial thinning and intermediate harvest will occur where needed as determined by silvicultural objectives, project planning, and visual quality objective. (Appendices H and M provide broad guidelines for various habitat groups.) Openings created by timber harvest will be reforested to the point where harvest of adjacent timber can occur and the combined area can still meet the VQOs of the area. Use timber harvest to rehabilitate existing harvest units, to improve the VQO. Prescribed burning will be used to accomplish slash disposal, site preparation, and silvicultural objectives. In habitat groups where fire is not a useful treatment tool, loping and scattering, YUM yarding, or other methods will be used to reduce fuel accumulations and prepare sites for regeneration provided the area goals are met.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Water and Soils - Timber harvest will not create runoff increases which are likely to result in long term channel degradation. All timber sale proposals will include an analysis of the current and projected status of sediment produced. The project proposal will analyze and evaluate the potential water quantity and quality and soil productivity impacts; mitigation measures should be developed to minimize adverse effects. If a project proposal shows the water quality cannot be maintained, the project will be reevaluated or terminated.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Minerals - Locatable—Plans of operation will include measures to maintain the VQO of the area. Leasable ---- See Forest Plan Amendment #13 for lease standards	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Lands – See Forest-Wide Standards.	
Facilities - Roads will be constructed as needed to meet the management objectives of the area.. Where existing trails are intersected by new road construction, the trail will be	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new construction or improvements.

Management Standards	If Standard applies, how is standard being met
evaluated to determine if it should be retained on the system or abandoned.	
Protection - Insect and disease control should emphasize reduction and prevention through timber harvest and timber stand improvement. The use of other approved integrated pest management techniques may be necessary at times. Aggressive control will normally be the appropriate fire suppression response in this management area. Prescribed fire with planned ignitions will be used in this management area, for the enhancement and maintenance of resources. Fuel reduction methods for activity created fuels include burning, removing residue, or rearranging, such as dozer trampling. Disposal activities will meet visual quality objectives. Wildfires will be suppressed in a manner that minimizes the use of heavy equipment.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.
Riparian - See Forest Wide Standards for grazing in riparian. Generally, harvesting will only occur in riparian areas if in conjunction with large sale activity on adjacent lands. In riparian areas, any timber harvest should be on a 240 year rotation and harvest types should be selection or group selection.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Management Area T5 (40,300 acres)	
Description - This management area consists of suitable timber stands interspersed with natural openings, generally with existing livestock allotments. Forage is provided by natural meadows and transitory range. The area consists of mostly Douglas-fir, with some lodgepole pine. It encompasses lower elevations and dry sites on the Forest usually on the fringes of native grasslands.	**Management Goals -** Increase production and quality of forage. Manage timber sites cost-effectively, by selecting the most economical harvest system and managing for natural regeneration. Provide for healthy stands of timber and timber products consistent with increasing quality and quantity of forage. Emphasize cost-effective timber production, while protecting the soil productivity. Maintain water quality and stream bank stability. Provide for other resource uses that are compatible with the other goals.
Recreation – Motorized and non-motorized dispersed recreation activities are permitted and may be supported by constructing or maintaining trails and trailhead facilities. Existing trails and facilities will be maintained unless they are no longer needed. Controls over motorized recreation will be implemented where necessary to protect the vegetation, soil, water, and wildlife resources and to prevent road	The resulting travel decision would comply with this standard.

Management Standards	If Standard applies, how is standard being met
damage.	
Visual – Management practices will generally follow guidelines for the modification VQO. The portions of this area (if any) that are within the sensitive viewing areas of the roads, trails, and areas listed in Appendix B will be managed to meet the more restrictive VQOs noted in the appendix. [See Forest Landscape Management Book, Vol. 2 (Ag. Hdbk. No. 461) for definitions of VQOs and how they are applied.]	This standard is not applicable to the Divide Travel Proposal
Wildlife and Fisheries –Wildlife and fisheries habitat improvement projects may be implemented, provided they are compatible with the management area goals. Maintain adequate thermal and hiding cover adjacent to forage areas, provided timber harvest volumes are not significantly reduced over the rotation period.	This standard is not applicable to the Divide Travel Proposal. The travel plan project is an administrative decision to close or open existing roads and does not authorize other actions related to other resources.
Range – Livestock grazing will generally be maintained at or above 1983 levels, unless a range analysis indicates there is a need to change. Vacant allotments will be restocked if a range analysis shows it to be feasible and a demand exists. Transitory range resulting from timber harvest will be integrated into the allotment planning process. Intensive management systems will be implemented, where cost-effective, to develop the range resource for sustained forage production. Management systems will be designed to minimize conflicts with wildlife. Forage improvement projects such as sagebrush burning, tree encroachment burning, and noxious plant control may be carried out on a scheduled basis. The schedule will be developed as part of allotment plans. Existing structural improvements, such as cattle guards, fences, and watering facilities, will be maintained or reconstructed as needed to continue present levels of grazing. Additional improvements may be built if the need is identified in an approved allotment management plan.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
Timber - This management area is suitable for timber management. Timber harvest methods include clearcutting, group selection, and shelterwood harvest, but may be modified to favor forage production. Clearcuts will be designed to ensure natural regeneration. Appendix M provides guidance for various vegetative management practices in the habitat groups on the Forest. Regeneration will be by natural means and will occur within 5 years of final harvest. As a minimum, a cutover area will not be considered an opening when: (1) a	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.

Management Standards	If Standard applies, how is standard being met
new forest stand is established and certified as stocked, and (2) vegetative conditions reach the point where harvest of additional timber can occur and the combined area can still meet watershed management objectives. Final entry of a shelterwood harvest may be delayed up to four decades to provide transitory range and to ensure regeneration. Animal control may be required on a case by case basis to ensure regeneration within 5 years of final harvest.	
Water and Soils - Timber harvest will not create runoff increases which are likely to result in long term channel degradation. All timber sale proposals will include an analysis of the current and projected status of sediment produced. The project proposal will analyze and evaluate the potential water quantity and quality and soil productivity impacts; mitigation measures should be developed to minimize adverse effects. If a project proposal shows the water quality cannot be maintained, the project will be reevaluated or terminated.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Minerals - Locatable—See Forestwide Standards. Leasable ---- See Forest Plan Amendment #13 for lease standards	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Lands – See Forestwide Standards.	
Facilities - Roads will be constructed as needed to meet the management area goals. Where existing trails are intersected by new road construction, the trail will be evaluated to determine if it should be retained on the system or abandoned.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new road or trail construction or improvements.
Protection - Insect and disease control should emphasize reduction and prevention through timber harvest and timber stand improvement. The use of other approved integrated pest management techniques may be necessary at times. The appropriate fire suppression response ranges from control to containment in this management area depending upon location, expected fire behavior, and other decision criteria related to values at risk. These decision criteria are stated in the Fire Management Direction in Appendix R. Prescribed fire with planned ignitions may be used in this management area, for the enhancement and maintenance of resources. Prescribed fire with planned ignitions may be used in this management area, for the enhancement and maintenance of resource, when within pre-established prescribed fire criteria. These criteria are detailed in the Fire Management Direction in Appendix R. Fuel reduction methods for activity created fuels include burning, removing	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.

Management Standards	If Standard applies, how is standard being met
residue, or rearranging, such as dozer trampling.	
Riparian - Generally, harvesting will only occur in riparian areas in conjunction with sale activity on adjacent lands. In riparian areas, any timber harvest should be on a 240 year rotation and harvest types should be selection or group selection. See Forestwide Standards for grazing in riparian.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Management Area W1 (86,100 acres)	
Description - This management area contains a variety of wildlife habitat ranging from important big game summer range to big game winter range. It has a variety of physical environments including riparian, calving or fawning areas, and hiding cover. All slopes, aspects and elevations are represented as well as a wide variety of vegetation ranging from grasslands to densely timbered areas.	**Management Goals -** Optimize wildlife habitat potential, including old growth, over the long term. Provide for other resource uses, if they are compatible with wildlife management goals.
Recreation – Controls over motorized recreation will be implemented where necessary to protect wildlife habitat values of this area. Non-motorized dispersed recreation may be supported by constructing trails and trailhead facilities when compatible with management area goals.	The resulting travel decision would comply with this standard.
Visual – Management practices will generally follow guidelines for the partial retention VQO. Exceptions may occur on a case-by-case basis to meet wildlife objectives. The portions of this area (if any) that are within the sensitive viewing areas of the roads, trails, and areas listed in Appendix B will be managed to meet the VQOs noted in the appendix. [See Forest Landscape Management Book, Vol. 2 (Ag. Hdbk. No. 462) for definitions of VQOs and how they are applied.]	This standard is not applicable to the Divide Travel Proposal.
Wildlife and Fisheries –Wildlife habitat improvement practices, including road management, prescribed fire, and other techniques, will be used to maintain and/or enhance the quality of big game and nongame habitat. Maintain adequate thermal and hiding cover adjacent to forage areas. Generally this means providing at least 25 percent cover, where available, on identified winter range.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize other resource improvement practices.
Range – Livestock grazing generally does not occur in this management area, except for minor amounts within existing allotments. Livestock grazing will continue within active allotments, however, the level may be increased or decreased if monitoring or range analysis show a need or opportunity to change.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
Timber - Timber will be harvested only if it can be used as a tool to maintain or enhance wildlife habitat values. Productive forest land is classified as unsuitable for timber management	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.

Management Standards	If Standard applies, how is standard being met
Water and Soils – See Forest-Wide Standards.	
Minerals – Locatable – Timing of mineral activities will be coordinated where practical with the needs of wildlife. This generally will require negotiations during development of operating plans for no surface occupancy during critical wildlife use. Leasable ---- See Forest Plan Amendment #13 for lease standards	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Lands – See Forest-Wide Standards.	
Facilities – Roads will generally not be constructed for surface management activities within this area. Exceptions may occur if needed for wildlife improvement projects. Roads through this area, which provide access to adjacent areas, are permitted only if project planning indicates it is the most feasible access. Road construction should avoid important big game areas, such as wet, boggy areas.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new road or trail construction or improvements.
Protection - Areas will be evaluated periodically for significant insect and disease problems. Endemic levels will be accepted as normal. If epidemic levels develop and control is necessary, the control method should minimize impacts on big game and other wildlife values. The appropriate fire suppression response ranges from control to confinement in this management area depending upon location, expected fire behavior, and other decision criteria related to values at risk. These decision criteria are stated in the Fire Management Direction in Appendix R. Prescribed fire with planned ignitions will be used in this management area, for the enhancement and maintenance of resources. Prescribed fire with unplanned ignitions may be used in this management area, for the enhancement and maintenance of resources, when within pre-established prescribed fire criteria. These criteria are detailed in the Fire Management Direction in Appendix R. Prescribed fire may be used as a tool to reduce natural fuels and improve quantity and quality of wildlife forage.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.
Riparian –See Forest-Wide Standards for grazing in riparian.	
Management Area W-2 (29,500 acres)	
Description: This management area consists of riparian and other lands that have forage, resting, and security characteristics and provide important spring, summer, and fall requirements for all big game species. Range allotments are in parts of the area. The variations in elevation, topography, slope, and aspect make these areas rich in species diversity.	**Management Goals -** Maintain and/or enhance habitat characteristics favored by elk and other big game species during spring, summer, and fall. Provide habitat diversity for non-game wildlife species. Provide forage for both big game and livestock.

Management Standards	If Standard applies, how is standard being met
	Provide for other resource objectives as long as their uses are compatible with the wildlife and livestock objectives.
Recreation – Controls over motorized recreation will be implemented where necessary to protect wildlife habitat values of this area. Non-motorized dispersed recreation may be supported by constructing trails and trailhead facilities when compatible with management area goals.	The resulting travel decision would comply with this standard.
Visual – Management practices generally will follow guidelines for the partial retention VQO. Exceptions may occur on a case-by-case basis where necessary to meet the area goals. [See Forest Landscape Management Book, Vol. 2 (Ag. Hdbk. No. 462) for definitions of VQOs and how they are applied.]	This standard is not applicable to the Divide Travel Proposal
Wildlife and Fisheries – Most new roads and about 50% of existing roads will be closed, at least seasonally. Wildlife habitat improvement practices, including road management, prescribed fire, and other techniques, will be used to maintain and/or enhance big game calving and summer habitat. Maintain adequate thermal and hiding cover adjacent to forage areas.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new road construction.
Range – Livestock grazing will generally be maintained near the 1983 levels within existing allotments, unless monitoring or a range analysis indicates a need to change. Livestock grazing will not be expanded into new areas. Planning for livestock improvements, such as fencing and water developments, will be coordinated with the wildlife biologist.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
Timber - Forested land is classified as unsuitable for timber management. Timber harvest will be used only to maintain or enhance habitat values.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize timber harvest.
Water and Soils – See Forest-Wide Standards.	
Minerals – *Locatable*: To the extent feasible, timing of mineral activities will be coordinated with the needs of wildlife and water. This generally will require negotiation during development of operating plans from May 15 to June 30. *Leasable*: See Forest Plan Amendment #13 for lease standards	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize mining operations.
Lands – See Forest-Wide Standards.	
Facilities –Road construction should not be necessary for surface	This standard is not applicable to the Divide Travel Proposal. The resulting

Management Standards	If Standard applies, how is standard being met
management, however, roads can be built through the area to access other management areas or for minerals development. Road construction should avoid important big game areas, such as wet boggy areas. Road management will be used to minimize disturbance to big game during critical periods.	travel plan decision is an administrative action and does not authorize any new road construction or improvements.
Protection - Areas will be evaluated periodically for significant insect and disease problems. Endemic levels will be accepted as normal. If epidemic levels develop and control is necessary, the control method should minimize impacts on the big game summer range values. The appropriate fire suppression response ranges from control to confinement in this management area depending upon location, expected fire behavior, and other decision criteria related to values at risk. These decision criteria are stated in the Fire Management Direction in Appendix R. Prescribed fire with planned ignitions will be used in this management area, for the enhancement and maintenance of resources. Prescribed fire with unplanned ignitions may be used in this management area, for the enhancement and maintenance of resources, when within pre-established prescribed fire criteria. These criteria are detailed in the Fire Management Direction in Appendix R.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize fire suppression activities.
Riparian –See Forest-Wide Standards for grazing in riparian.	
Management Area P3 (32,900 acres)	
Description - This management area includes the Electric Peak Roadless Area recommended by the Helena National Forest for Congressional designation as wilderness. This recommendation is a preliminary administrative recommendation that will receive further review and possible modification by the Chief of the Forest Service, the Secretary of Agriculture, and the President of the United States. Final decisions on wilderness designation have been reserved by the Congress to itself.	**Management Goals -** Manage the recommended wilderness additions to protect the wilderness characteristics and to the extent possible allow existing uses, pending Congressional classification.
Recreation - Visitor use may be restricted to prevent loss of solitude or unacceptable depreciation of the wilderness qualities. The limits of acceptable change (LAC) process may be used to determine if management actions are necessary to preserve natural environments and provide wilderness experiences	The resulting travel decision will comply with this standard.

Management Standards	If Standard applies, how is standard being met
Visual - Management practices will follow the guidelines for the preservation VQO.	This standard is not applicable to the Divide Travel Proposal.
Wilderness - If recommended Big Log addition receives wilderness classification, wilderness management direction will be the same as for the rest of the Gates of the Mountains, in Management Area P-2 Existing structures will be retained. If major rehabilitation or maintenance is needed, an assessment of the continued need and cultural significance will be completed.	This standard is not applicable to the project, as Big Log and the Gates of the Mountains Wilderness are located outside of the planning area. This decision is an administrative action and does not alter any existing structures in any way.
Wildlife and Fisheries - Wildlife habitat improvement projects will conform to Forest Service Wilderness Policy (FSM 2320). Fish stocking will conform to Forest Service wilderness policy. Stocking can continue in lakes where there is a history of such activity.	Relative to fisheries, fish stocking would not be affected by the travel plan project, and would continue in lakes under the direction of the Montana Department of Fish, Wildlife & Parks.
Range -Natural vegetative composition will be maintained. All existing range allotments may be maintained and managed in accordance with wilderness values. Existing livestock management improvements may be maintained. Additional structural improvements may be built only when necessary to maintain the wilderness values.	This standard is not applicable to this project. The resulting travel plan decision is an administrative action and does not authorize grazing or allotment management plans.
Timber -Timber harvest is not permitted. The management area is classified as unsuitable for timber management.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or ground disturbance.
Water and Soils - See Forest-Wide Standards.	
Minerals - Areas recommended for wilderness, Electric Peak and Mount Baldy, that currently have oil and gas leases will be managed under the stipulation of the lease until the lease expires. Applications for further oil and gas leasing will be accepted but not processed until the wilderness classification has been determined.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new mineral oil and gas leases. Mount Baldy is located outside of the planning area.
Lands -This management area is an exclusion area for utility corridors (See Appendix P).	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any additional, or changes to, utility corridors.
Facilities - Facilities and structures may be constructed to ensure the protection of the wilderness resource and safety of users. However, facilities may not be constructed solely to provide convenience to users. Trail construction is permitted and should be accomplished with minimal	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any new road or trail construction or improvements.

Management Standards	If Standard applies, how is standard being met
disturbance of the natural environment. Roads will not be constructed in this management area.	
Protection - Areas will be evaluated periodically for significant insect and disease problems, such as mountain pine beetle. Endemic levels of insects and most disease agents that do not normally pose threats to adjacent lands will be accepted as naturally occurring. Control measure would be initiated only as a last resort if epidemics do not subside naturally and continue to threaten lands outside the proposed wilderness. Fire Management Direction in Appendix R will be implemented that permits unplanned ignitions to burn when within prescription, to perpetuate the natural plant and animal diversity. Suppression actions need to be compatible with wilderness management objectives The appropriate fire suppression response ranges from control to confinement in this management area depending upon location, expected fire behavior, and other decision criteria related to values at risk. These decision criteria will be stated in a Fire Management Action Plan.	This standard is not applicable to the Divide Travel Proposal. The resulting travel plan decision is an administrative action and does not authorize any timber harvest or fire suppression activities.

Appendix B. Cumulative Effects

The area to be analyzed in a cumulative effects analysis is usually not limited to the project area, and it varies with the resource or species being analyzed. Each resource will have different "boundaries" for its effects analysis. Quantified, detailed information regarding effects, leading to specific reasoned conclusions can be found in the cumulative effects section of each specialist report located in the project record. The following tables of past, present, and reasonably foreseeable projects have been used by the interdisciplinary team members in determining the cumulative effects for their respective resource. Each resource specialist has determined which of the following activities are applicable to their analysis, depending on their cumulative effects boundary. Some resource reports may mention a project that is missing from this table, however the "hard look" for analysis purposes has been taken.

Table **4** displays the Past Activities which have influenced the existing condition. Table **5** displays the Current and Ongoing Activities. These projects are in the implementation phase. **Table 6** displays the Reasonably Foreseeable Activities. The projects in Table B3 are still in the planning phase, which means there is potential for change due to public input, changed conditions, etc.

Table 3 - Past Vegetative and Fuels Activities/Projects

Activity/Name	**Decade/Year**	**Scope of Activity**
Pre 1960		
Forest Service Timber Harvest	Pre 1960	**Divide Travel Plan Area** Regen Harvest: 317 acres Intermediate Harvest: 10 acres Total: **327 acres**
Fuels Activities	Pre 1960	**Divide Travel Plan Area** Total Fuels acres: **0 acres**
1960 - 1969		
Forest Service Timber Harvest	1960 - 1969	**Divide Travel Plan Area** Regen Harvest: 2791 acres Intermediate Harvest: 216 acres Total: **3007 acres**
Fuels Activities	1960 - 1969	**Divide Travel Plan Area** Total Fuels acres: **527 acres**
1970 - 1979		
Forest Service Timber Harvest	1970 - 1979	**Divide Travel Plan Area** Regen Harvest: 2064 acres Intermediate Harvest: 452 acres Total: **2516 acres**
Fuels Activities	1970 - 1979	**Divide Travel Plan Area** Total Fuels acres: **1361 acres**

1980 - 1989		
Forest Service Timber Harvest	1980 - 1989	**Divide Travel Plan Area** Regen Harvest: 3339 acres Intermediate Harvest: 751 acres Total: **4090 acres**
Fuels Activities	1980 - 1989	**Divide Travel Plan Area** Total Fuels acres: **7479 acres**
1990 - 1999		
Forest Service Timber Harvest	1990 - 1999	**Divide Travel Plan Area** Regen Harvest: 1427 acres Intermediate Harvest: 2637 acres Total: **4064 acres**
Fuels Activities	1990 – 1999	**Divide Travel Plan Area** Total Fuels acres: **2895 acres**
2000 - 2009		
Forest Service Timber Harvest	2000 - 2009	**Divide Travel Plan Area** Regen Harvest: 108 acres Intermediate Harvest: 276 acres Total: **789 acres**
Fuels Activities	2000 - 2009	**Divide Travel Plan Area** Total Fuels acres: **204 acres**
2010 - 2014		
Forest Service Timber Harvest	2010 - 2014	**Divide Travel Plan Area** Regen Harvest: 401 acres Intermediate Harvest: 1416 acres Total: **1817 acres**
Fuels Activities	2010 - 2014	**Divide Travel Plan Area** Total Fuels acres: **2266.9 acres**
Timber Harvest on Private and other non FS ownership (acres are approximated based on GIS)	2005 - 2014	**Divide Travel Plan Area** Timber Harvest: 74 acres Total: **74 acres**

Table 4 - Past Activities

PAST		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
EPA-Landmark Subdivision	2014	Remediation of the Landmark Subdivision. Final property remediation was to be completed in 2014.
Albright Special Use Authorization	2014	This project is the issuance of a new special use authorization to replace existing authorization HEL116, which expired at the end of 2013. The special use authorization is for a domestic well and associated infrastructure.
EPA-Little Lilly/Lee Mountain Complex removal and reclamation	2013	Mine waste removal and reclamation. Also installed groundwater monitoring wells to evaluate arsenic levels pre and post removal.
Blackfoot-North Divide Winter Travel Planning	2013	Decision to change the existing roads and trail systems on National Forest System lands in the Blackfoot-North Divide planning area. This plan provided for a variety of motorized and non-motorized winter recreation opportunities while also taking into wildlife.
Kading Campground	2010-2011	A culvert near the campground entrance has been replaced with a bridge that meets 100-year flood requirements. Beetle infested hazard trees have been removed in Kading CG & around Kading Cabin for visitor safety. Shrubs & trees have been planted to improve aesthetics. Camping spurs have been lengthened & widened w/ some converted to pull-through spurs. New picnic tables and fire rings have been installed throughout the campground & at Kading Cabin to American Disability Act (ADA) standards. Pathways to the existing vault toilets have been widened & improved to ADA standards. Curb stops have been installed & a new visitor information kiosk has been erected at the campground entrance. A single-panel kiosk has been installed at the nearby Blackfoot Meadows Trailhead.
Nevada/Ogden Bridge	2011	American Restoration & Recovery Act
Kading Road	2011	Aquatic Organism Passage Legacy Road: Road 227 replace undersized Kading Creek culvert with a 30’ span by 26’ wide concrete bridge
Sally Anne Road	2011	Aquatic Organism Passage Legacy Road: Road 527 replace undersized Sally Anne culvert with a 12’ span by 4’ rise by 40’ long three sided concrete box culvert

PAST		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Clark's Canyon Road	2011	Aquatic Organism Passage Legacy Road: Road 4005-A1 replace undersized Clark's Canyon Creek culvert with a 128" by 83" by 48' long corrugated steel pipe-arch
Fields Road	2011	Aquatic Organism Passage Legacy Road: Road 1842 at mile post 0.5 replace 36" diameter CMP w/ 28' spill through bridge
Sawmill Road	2011	Aquatic Organism Passage Legacy Road: Road 571 at mile post 14.2 replace 18" diameter CMP w/ 28' span spill through bridge
Bald Butte Mine & Mill Site DEQ Reclamation	2010-2012	Approximately 3.5 miles southwest on Marysville on patented mining claim surrounded by BLM and HNF. Approximately 40,000 cubic yards of waste rock and about 80,000 cubic yards tailings will be removed. To accommodate haul traffic there will be widening of routes up to no more than 12 feet, grading, and turnouts installed. Culverts will be replaced or upgraded. The intersection of FS 1855 & BLM 504 will be upgraded to a 100 year-flow culvert. Reconstruction of pond & drainages w/ re-vegetation along w/ either a road closure of BLM 504 or a jackleg fence will be place to deter off-road, motorized recreational use.
Road Drainage Repairs	2010	Roads 136, 314, 335, 571, 571-C1, 708, 1805 and 1855; Blading 54.2 miles; construct drain dips 286; clean cattle guards 12, install 1 new 18" culvert
Sally Ann Cr. Culvert Replacement	2010	Minnehaha Road 527, MP 0.8, remove existing culvert and install one AOP recast 3-sided concrete box culvert 12 foot span X 4 foot rise X 40 feet long; 4 inches new surface aggregate for 240 feet.
Tree Farmer Road	2010	Resource Advisory Council: Phase I Road 314 reconstruct 2.4 miles; 4" new surface aggregate for 1.8 miles; construct 2 drain dips; install 2 new 18" culverts Phase II Road 314 reconstruct road for 1 mi.; new surface aggregate for 1.2 miles; construct 2 drain dips
Spotted Dog Land Purchase	2010	In 2010 the State Of Montana purchased 27,616 acres of land from Rock Creek Cattle Co. The land is now being managed by Montana Fish Wildlife and Parks as a Wildlife Management Area.
Spring Gulch	2010	Spawning & rearing habitat improvement in the headwater tributary of Dog Creek, a 303(d) listed stream, includes construction of about 1.5 miles of fence along the banks of about 0.6 miles of stream. Both 3-strand barbed wire & jack rail fence would be used. Stream banks & channel would be hardened at the upper end of the exclosure in anticipation of heavier use following construction of the fence. .

PAST		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Minnehaha Road	2010	Legacy Road: Road 527 recondition 4.9 miles, construct 3 drain dips; 4” new surface aggregate on 1.15 miles; install 36 new 18” culverts; replace 2 undersized culverts w/ larger culvert
Hahn Creek Roads	2010	American Restoration & Recovery Act: Road 495 replace undersized Hahn Creek culvert w/ a 123” span by 83” rise by 40’ corrugate steel pipe arch Road 1856 replace undersized culvert w/ a 123” span by 83” rise by 40’ corrugate steel pipe arch
Telegraph Creek Roads	2009-2010	American Restoration & Recovery Act: Road 495 reconstruct 4.1 miles; 4” new surface aggregate for 4.1 miles; dust palliative 1.4 miles; install 24 new 18” culverts; replace 5 undersized culverts w/ larger culverts Road 1856 install 7 new culverts; replace 4 undersized culverts w/ larger culverts Road 1857 install 7 new culverts
Little Blackfoot Roads	2010	American Restoration & Recovery Act: Road 227 recondition 6 miles; 4” new surface aggregate for 6 miles; dust palliative 6 miles; install 8 new 18” culverts; install 1 new 24” culvert; raise roadbed 2’ for 200’ just south of Hat Creek to protect roadway during spring runoff
Hope-Dog Creek Road	2010	American Restoration & Recovery Act: Road 571 reconstruct 8.03 miles; 4” new surface aggregate for 8.03 miles; install 10 new 18” culverts; replace 1 undersized culvert w/ a 24”
Road Drainage Repairs	Completed 2009	Roads 123, 227, 495, 495-D1, 495-E1, 527, 1856, 1856-D1, 1856-E1, 1856-J1, 1857, 1857-D1, 1863, 1863-A1 and 4104; Blading 43.2 miles, construct drain dips 231
Thomas Brothers Lumber	December 2009	Hat Creek & Little Blackfoot – Commercial Road Use Permit
Zucconi Private Road	November 2008	Road construction of about 2,000 feet
U.S. Hwy 12 Improvements	October 2009	Removal of vegetation (4 to 5 log truck loads), installation of guard rails, erosion protection, and sanding/salting.

PAST		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Macdonald Pass Wildfire	2009	Wildfire that burned approximately 170 acres in 2009.
Continental Divide Trailhead (CDNST)	July 2009	Construction of approximately seven miles of new CDNST to reroute the trail to the Continental Divide. This new segment connects to the Bison Creek Area where the CDNST trail leads onto the neighboring Beaverhead-Deerlodge National Forest.
Blizzard Basin Water Developments CD	June 2008	An old water development was replaced in addition to one new water development. Both water developments were installed to collect water in a conventional headbox with a pipe attached to fill a tank at each location.
Special Recreation Use Permits	1998-2007	Tri-Arabian Horse Club trail ride in Sweeney Creek Area (2007), Society for Creative Anachronism historic reenactment at Sunshine Lions Camp (2002), Montana Department of Corrections and Aspen Youth Alternatives (AYA) in the Little Blackfoot area (1998), Elliston Volunteer Fire Department charity snowmobile ride in the Little Blackfoot and Telegraph area (1998-2003)
North Pasture Division Fence	March 2006	Installation of this fence enabled the permittee to get better cattle distribution in the eastern portion of the pasture that did not receive very much use until this fence was installed. In addition, it helped keep cattle off the Frog Pond areas as well as off Elliston Creek. It also shortened the season of use for two parts of the pasture
Continental Divide Trailhead & Connector Trail	August 2005	Construction of trailhead and approximately ½ mile of new road to access the trailhead and approximately ½ mile of connector trail to tie in with the existing Continental Divide National Scenic Trail
North Western Corporation Rimini Extension	July 2004	Authorized installation of a short segment of 0.6 kV aerial power line on NFS lands in the Ten Mile drainage. North Western Corp. was issued a Special Use Permit authorizing installation, use and maintenance of a 75-foot power line.
Special Use Permit for Renovations to the MacDonald Pass Electronics Site	June 2004	This special use permit authorized the State of Montana Department of Transportation, Lewis & Clark County Sheriff's Office, and the Federal Aviation Administration to cooperatively construct and share the cost of maintaining a new repeater building and tower. This facility houses local, state, and federal government communications users at the site located at the established MacDonald Pass Electronics Site.

PAST		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
North Western Corporation Moose Creek Utility Extension	February 2004	This decision authorized the North Western Corp. the installation, use & maintenance of a 0.6kV buried power line in the Moose Creek drainage. This action includes a 30-foot power line & power pole.
Jericho Mountain Continental Divide Trail Reroute	April 2003	This decision implemented new trail construction of approximately 2.2 miles of the CDNST #337 to align the trail to the Continental Divide as per Agency guidance.
Salisbury Private Road FLPMA Easement	January 1993	An easement to construct, and maintain a private road across NFS lands was issued to Mr. and Mrs. Salisbury under the Federal Land Policy and Management Act to provide permanent access to their private property and home.
Eakin Encroachment	August 2002	Continued use of a small tract on NFS lands currently occupied by an encroaching privately owned garage. A special use permit for occupancy of .04 acres was issued to Kirk and Cathy Eakin.
Capital Trail Vehicle Association (CTVA) & Montana Trail Vehicle Riders Association Annual Campout	July 2002	This one-time special use permit was issued to CTVA/Montana Trail Vehicle Riders Association to hold their annual statewide campout in the Mullan Pass Area from July 3-7, 2002.
Zucconi Private Road and Utilities	August 2002	Road construction of about 290 feet on NFS lands using a Private Road special Use Permit authorizing construction, use and maintenance of the access ROW.
Touch America, Inc. Fiber Optic Installation	September 2000	Authorization to install, use and maintain six underground two-inch fiber optic ducts, one duct installed w/ a fiber optic cable, on NFS lands near Hwy 12 on MacDonald Pass using a Construction Special Use Permit followed by a single, consolidated, region wide Special Use Permit. About 1.15 acres within the paved/gravel shoulder of Hwy 12.
Continental Divide Trail Reconstruction Phase 1	April 1999	Phase I entailed the construction/reconstruction on several non-motorized segments of CDNST #337 near MacDonald Pass, Mullan Pass to Priest Pass, and Black Mountain.

PAST		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Monarch Creek Trail Reconstruction	June 1998	Construction/reconstruction of the non-motorized Monarch Creek Trail #362 in the Electric Peak Roadless Area. Work includes installation of 65 water-bars, 3 wooden stock bridges, and 3 French Drains; reconstruction of 5 switchbacks; construction of a turnpike approximately 25 meters long, obliterate approximately 727 meters of abandoned trail and grub approximately 560 meters of existing trail.
Frontier Town Monument, Sign, and Power Line	February 1998	Re-issuance of a Special Use Permit to Erik Little, the new owner of Frontier Town for the private-owned monument, sign, and power line on 0.22 acres of NFS lands.
Treasure Mountain Snowmobile Trail Relocation	November 1997	This decision approved relocating segments of the groomed snowmobile trail in the Treasure Mountain area. Segments included Little Blackfoot River Road, FSR 1857-A1, FSR 1857, FSR 1857-D1, FSR 1859 to the Telegraph Creek Road. Another section starts on FSR 1857 at the junction with FSR 1857-B1 and proceeds on FRS 157-B1 to Ontario Creek Road 123.
Austin Snowmobile Parking	November 1997	This decision approved the construction a parking area located north of the Austin Creek Road. Approximately ½ acre was cleared to accommodate parking for snowmobile use in the winter months.
BR Cattle Company Special Use Permit; livestock Area in Hope Creek	June 1996	Authorized the use of NFS lands in the Hope Creek drainage for livestock grazing using a Special Use Permit allowing grazing of cattle on 200 acres. At the time these NFS lands were surrounded by private land.
Hope Creek Temporary Road Construction and Commercial Use	October 1995	Authorized construction of approximately 185 feet of temporary road across NFS lands in the Hope Creek drainage. This provided short-term access to adjacent private lands to harvest trees. In addition, this permit authorized commercial use of existing Forest System Roads #571, #708, #1855 for transport over a three-year period.
Montana Bureau of Mines and Geology Seismic Monitoring Station	July 1995	Installation, use, and maintenance on a seismic monitoring station on lands administered by the Helena Ranger District.
TRI Fiber Optic Installations	May 1995	Authorized installation, use, and maintenance of two fiber optic lines on NFS lands. Location for both buried and aerial lines use ROW already being used as utility/gas lines.

PAST		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Red Mountain/Park Commercial Road Use	March 1995	Authorized private commercial use of FSR in the Red Mountain/Park Lake area to transport timer products off private property. FSRs will be maintained & used of about 4.2 miles of FDR #4009, 1.3 miles of FDR #4009-B1, 0.1 miles of FDR #1878-C1, and 0.5 mile of non-system roads using a Road Use Permit.
Bullion Parks/Telegraph Creek Private Commercial Road Use	December 1994	Authorized commercial use of NFS lands and roads in the Jericho Mountain area to transport timber products off private property, which includes construction of approximately 1200 feet of temp skid trail and docking areas, and use of about 5.4 miles of existing FS roads for haul.
MacDonald Pass Electronics Site	October 1994	Authorized the use of NFS lands to install, operate and maintain a commercial cellular telephone facility, and amateur radio system on the MacDonald Pass Electronics Site
Dog Creek Road Improvement	September 1992	This decision included clearing of trees and other vegetation for a distance of approximately 10 feet on either side of 0.8 miles of the existing Dog Creek Road.
Montana Army National Guard Special Use Permit	April 1992	Special use permit for training maneuvers, permits issued in 1992 and 2004 for land navigation training
Issuance for Mining Plans of Operations. Ophir Group Project American Copper & Nickel Co., Inc. Mining Plan of Operations	October 1991	Ophir Gulch (1991): exploratory drilling with approximately 0.3 acres or surface disturbance via road reconstruction and wheel tracks, reclamation was included. Clemmer Gulch & O'Keefe Mountain Projects (1992): headwaters of Telegraph & Ontario Creek drainages, eight drill sites with 60x60 foot drill pads with approximately 2 acres of surface disturbance. Ophir Gulch (1993): exploratory drilling, Irish Hill (1993): ridge between Trout Creek and Dog Creek drainages, exploratory drilling. Bugler (1998): exploration drilling in Charity Gulch.
Minnehaha Trail Project	September 1991	Decision authorized the development of a trail route between the Moose Creek work center and Forest Road 527 using an old abandoned railroad bed. Activities included construction of a bridge, installing a culvert, pruned trees and shrubs, removed rocks, and relocated power poles off the railroad bed.
Ten-Mile Creek Gravel Source Drilling	July 1991	Authorized construction of approximately 580 feet of private road across NFS lands for short-term access to a gravel source. Up to 5 core sample test holes were implemented with the road obliterate and re-vegetated after completion of the sampling.

PAST		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
John T. and Merrylee McCrea small Tracts Case	July 1991	The Forest Service sold 2.8 acres that contained three tracts of mineral fractions virtually surrounded by patented mining claims to John T and Marylee McCrea in order to improve management and adjust property boundaries.
U.S. West Buried Phone Line	June 1991	This decision authorized installation of a buried phone line across NFS lands within the ROW of FSR #137 under a special-use permit.
Cattle and Horse Allotments	1988	Grazing permits authorized within the allotments on a 10 year cycle for the Hat Creek, MacDonald Pass, Clancy, Ophir-Hope, Ten Mile-Priest Pass, and McClellan allotments.
EA Continental Divide National Scenic Trail on Federal Lands	April 1989	An environmental assessment was used for analysis
Chessman Reservoir Complex-Repair and Management	February 1988	Issued the City of Helena a permit authorizing the Chessman Reservoir and dam rehabilitation work subject to mitigation along with associated facilities.
Rimini Abandoned Mine Reclamation Project Drilling of Water Quality Monitoring Well	July 1988	Approved a plan to drill a well for sampling groundwater quality near Ten-Mile Creek,
Chessman Minerals Pit Site	July 1987	Determined that this pit site is ideal to be used for repair and maintenance of existing forest roads.
Priest Pass Resurfacing Project	February 1987	This action improved existing forest roads through repair and maintenance. Priest Pass road (FSR #335) was resurfaced with approximately 4 inches of crushed aggregate surfacing on 5.5 miles of the 14 foot wide road. This was completed to reduce erosion damage and improve access for timber management and public use activities. The installation of additional culverts, other drainage structures, and erosion control seeding was implemented to further reduce sedimentation.
Snowshoe Exploration	2010	Proposal to dig 12 test holes down to bedrock and remove samples for testing.

Table 5 - Present and Ongoing Activities

Present/Ongoing		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Prickly Pear Sportsmen's Association Target Range	December 2000 Ongoing	This 20-year Special Use Permit for a nine-acre facility that includes an access road, gate/perimeter fence, parking lot, 3 ranges, storage shed, and toilets.
Red Mountain Flume/Chessman Reservoir Project	2014-ongoing	Currently implementing fuel reduction project around Chessman Reservoir and the associated water flume infrastructure. Treatments are designed to reduce hazardous fuels around existing infrastructure. Approximately 500 total acres of fuels treatments and harvest are expected.
11 Recreation Residence Tracts	Ongoing	Residences are authorized under a 20-year Special Use Permit. Lots are typically 1 acre or less in size. These cannot be utilized as a primary residence and can only be used less than six months in a calendar year. Six are located in the Forest Heights Tract and are issued to: Bernard F. Christiaens, Donald Garrity, William Lee Greiner, Tim & Heidi O'Brien, Margaret Regan,, William A. Brown III, and Mike Wall. Five recreation residences are permitted within the Moose Creek VillaTract and are issued to: (Lee & Lola Cloninger; Duane A. and Sandi Fernholz; Paul F and Dianne Hamper and Helen Curtis. (use code 123)
3 Campgrounds 1 Day Use Area 2 Rental Cabins	Ongoing	Campgrounds are open seasonally from May through October and include: Kading, Cromwell Dixon, and Moose Creek. Day use areas: Ten Mile Picnic Area Rental Cabins: Kading and Moose Creek
Routine Use and Maintenance of Non-motorized Forest Trails for Summer Use	Ongoing	There are some non-motorized trails in the Ten Mile Drainage including: Ten Mile Environmental Trail and the Switchback Ridge Trail. Other areas: Continental Divide National Scenic Trail, Little Blackfoot Meadows trail, Monarch, and Larabee Gulch. These trails receive routine maintenance and clearing of debris annually.

Present/Ongoing		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Routine Use and Maintenance of Forest trails and areas for over-snow winter use Approximately 10 miles groomed Cross-Country Ski Trails	Ongoing	MacDonald Pass Cross-Country Ski Trail system is located near the Forest Heights Recreation Residence. Approximately 10 miles are groomed by the Helena Last Chance Nordic Ski Club as per a cooperative agreement between the Helena NF and Club starting on or after December 2 up to May 15 depending upon snow levels. The formerly Quigley Group Use Area/Campground is used by cross-country skiers The former Moose Creek Group Use Area is utilized as a snowmobile trailhead accessing a trail system that connects to Bullion Parks over to Jericho Mountain and down along the Hahn Creek Road tying into the Little Blackfoot Road and Kading Cabin /Limburger Springs areas. There is also a snowmobile trailhead located off of the Little Blackfoot Road near the Lions Sunshine Camp. Another over-snow vehicle system is in the Mullan Pass and Blossburg areas. Please refer to the Divide Travel Plan alternative maps for specific trail locations and areas open to over-snow use.
MacDonald Vista Point	Ongoing	This vista point is located to the south of MacDonald Pass and is a popular observation site. It accesses the Continental Divide National Scenic Trail. During the winter months, this area has been utilized for non-motorized environmental education programs.
Special Recreation Use Permit Helena Lion's Sunshine Camp	Ongoing	This authorization is classified as an Organizational Camp issued to the Helena Lion's Club to manage and operate the Lion's Sunshine Camp located in the Blackfoot River drainage on NF lands. The camp provides recreational opportunities in a rural environment to families and youth oriented groups. This camp has been under a special use permit since 1943. (use code 113)
1 Special Use Permit for Monument	Ongoing	This permit is to the Grand Lodge A.F. and A.M. of Montana for their monument located near Mullan Pass. (use code 332)

Present/Ongoing		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Micro-Wave Electronic Sites north & south of Hwy 12 on MacDonald Pass	Ongoing	Both are under a Special Use Permit with the north site about 40 acres and includes seven communication facilities and about 15 permit holders accessed by the Microwave Road. The south site retains one authorized airport beacon near the Vista Point overlook.
Routine Use and Maintenance of Open Forest Roads	Ongoing	Routine maintenance not necessarily annually includes blading, brushing, culvert cleanout, etc. Use of Forest Roads varies by route and season with use of Forest Heights Road limited to residence permittees.
HMO Closures on the Helena Ranger District	2010-Ongoing	Access controls or the permanent closure of mine openings on the Helena Ranger District to ensure public safety. Closures will take place at multiple locations across the Helena Ranger District. More expected closures in 2015 and beyond.
Power Utilities, Phone Utilities, Yellowstone Gas Pipeline, & Touch America Fiber Optic Lines	Ongoing	Utility lines are authorized under the terms of a special use permit. The gas and fiber optic line are co-located. Routine maintenance are accepted and understood under the terms of the permit and include some motorized use. Located at & near MacDonald Pass.
MT Army Nat. Guard High Elevation Helicopter Landing/Take Offs & Water Bucket Training	Decision on January 2010	This decision issues a special use permit to the MT Army Nat. Guard to utilize Red & Lava Mountain for these landing & take off maneuvers during the months of June & December. Red Mountain is the only peak within the Divide Travel project boundary.
MT Army National Guard	Ongoing	Permit for winter survival training on MacDonald Pass
14 Private Road Special Use Permits issued to private landowners	Ongoing	These permits were issued to private landowners to access their private land on roads that are primarily not open to public use and some have seasonal closures. They are located throughout the project area.
Chessman Reservoir Complex & Waterlines/Ditches	Ongoing	The City of Helena was issued a special use permit to maintain the Chessman Reservoir and associated waterlines/ditches for providing potable water to the City of Helena.. This reservoir and water system is located in the Red Mountain Area.

Present/Ongoing		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Highway Maintenance Station under a special use permit	Ongoing	This is under a special use permit issued to the Montana State Department Commission. The station is located on the upper east side of MacDonald Pass on the west side of US Highway 12.
4 Natural Resource Conservation Service Snotel Sites under a special use permit	Ongoing	The NRCS maintains four sites for monitoring snow depth and water content under a special use permit. They are located near Chessman Reservoir, Frohner Meadows and Ten Mile Creek.
Timber Harvest on Private Lands	Ongoing	Timber harvest may occur on private lands on unspecified acres, primarily tractor logging within the planning area
Noxious Weed Treatment on National Forest Lands	Ongoing	Herbicide treatment is primarily along roads and in patches that are accessible to mechanized equipment (spraying with ATVs) and/or by hand, biological (insects), goats/sheep, and aerial spraying. Treatment areas are identified in the EIS/ROD and are continually updated and treated as new infestations are located.
Grazing Activities on BLM, State, and Private Lands	Ongoing	Grazing of cattle, sheep and horses on private lands within the Divide Travel Planning Area. This may result in impacts to riparian vegetation, stream banks, and upland vegetation. There will also be results to vegetation management, forage production, and economic well-being.
Blossburg C&H Grazing Allotment	Ongoing	10,657 acres in project area; 350 permitted cow/calf pair; 107 permitted use days; start of permit in mid-June; deferred grazing system; resides on both sides of the divide.
Clarks Canyon Grazing Allotment	Ongoing	5,910 acres in project area; 121 permitted cow/calf pair; 100 permitted use days; start of permit late June; season long grazing system; resides west of the divide.
Deadman Lost Horse C&H Grazing Allotment	Ongoing	6,747 acres in project area; 44 permitted cow/calf pair; 92 permitted use days; start of permit in July; deferred grazing system; resides east of the divide.
Dog Creek Grazing Allotment	Ongoing	1,729 acres in the project area; 80 permitted cow/calf pair; 92 permitted use days; start of permit is in July; resides west of the divide for season long grazing. Data collected 2009

Present/Ongoing		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Drumlummen Skelly C&H Grazing Allotment	Ongoing	3,592 acres in project area; 230 permitted cow/calf pair; 40 permitted use days; start of permit varies July-Oct; rest rotation grazing system; resides on both sides of the divide.
Empire Grazing Allotment	Ongoing	1,042 acres in project area; 66 permitted cow/calf pair; 68 permitted use days; start of permit is in July; resides on both sides of the divide under a rest rotation grazing system.
Frohner Grazing Allotment	Ongoing	485 acres in project area; 76 permitted cow/calf pair; 102 permitted use days; start of permit use is July; season long grazing system that resides east of the divide.
Hat Creek C&H Grazing Allotment	Ongoing	8,207 acres in the project area;140 permitted cow/calf pair; 102 permitted use days; start of permit in late June; resides west of the divide and is under a deferred grazing system. Data collected 2009. A 10-year grazing permit was issued to Senecal Brothers Ranch for the grazing of domestic livestock on the Hat Creek C&H Allotment in Powell County, Montana on the Helena Ranger District.
MacDonald Pass Grazing Allotment	Ongoing	6,901 acres in project area; 104 cow/calf pair; 115 permitted use days; start of permit in late June; resides on both sides of the divide and is under a deferred grazing system.
Ophir/Hope C&H Grazing Allotment	Ongoing	13,528 acres in project area; 192 permitted cow/calf pair; 99 permitted use days; start of permit in late June; season long grazing system; resides west of the divide. A 10-year grazing permit was issued to Senecal Brothers Ranch for the grazing of domestic livestock on the Ophir/Hope C&H Allotment in Powell County, Montana on the Helena Ranger District.
Slate Lake C& H Grazing Allotment	Ongoing	9,331 acres in the project area; 205 permitted cow/calf pair; 92 permitted use days; start of permit in mid-June; deferred grazing system; resides west of the divide. Data collected 2009
Spotted Dog Grazing Allotment	Ongoing	8,453 acres in the project area; 245 permitted cow/calf pair; 102 permitted use days; start of permit is in July; resides west of the divide for season long grazing. Data collected 2009

Present/Ongoing		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Spring Gulch C&H Grazing Allotment	Ongoing	3,613 acres in project area; 45 permitted cow/calf pair; 62 permitted use days; start of permit in mid-July; season long grazing system; resides west of the divide A 10-year grazing permit was issued to BR Cattle Company for the grazing of domestic livestock on the Spring Gulch C&H Allotment of the Helena Ranger District.
Tenmile Priest Pass C&H Grazing Allotment	Ongoing	15,990 acres in project area; 200 permitted cow/calf pair; 107 permitted use days; start of permit mid-June; rest rotation; resides on both sides of the divide. 2003 Contract for the Priest Pass and Black Mountain allotments, range conditions and weed inventories were completed under a contract. In 2009 proper functioning condition was reached on Mike Renig. A 10-year grazing permit was issued to the RV Ranch for the grazing of domestic livestock on the Hat Creek C&H Allotment in Powell and Lewis & Clark Counties, Montana on the Helena Ranger District.
Clancy Unionville Vegetation Manipulation and Travel Management Project	Ongoing	Travel management, forest vegetation improvements, fuels treatments (non-activity fuels), watershed improvements, road improvements/construction, road maintenance, and road decommissioning. Harvest activities have been completed, fuels treatments are ongoing.
Helena Mineral Society-Crystal Mine	Ongoing	Sally Ann Creek. T8N, R6W, Section 2
Monarch Mineral Sampling	Ongoing	Notice of Intent for mineral sampling and exploration activities to collect samples for testing from unprocessed mine material piles. Located in T8N, R6W, section 31.

Present/Ongoing		
Project/Activity Name	**Decision Date and/or Status**	**Brief Description**
Personal Use Firewood and Post and Pole permits	Ongoing	Approximately three million board feet of wood is sold across the Helena National Forest yearly under personal firewood or post and pole permits. A portion of this volume comes from the project and combo boundary.
Red Mountain Flume/Chessman Reservoir Project	Ongoing	Currently implementing fuel reduction project around Chessman Reservoir and the associated water flume infrastructure. Treatments are designed to reduce hazardous fuels around existing infrastructure. Approximately 500 total acres of fuels treatments and harvest are expected.
Northwestern Energy Powerline	Ongoing-2015	Hazard tree removal along powerline corridor in Tenmile drainage and MacDonald pass.
Banner Creek Bridge #1	Ongoing	Deck and curb replacement.
Mining Plan of Operations for Karger Lode Claims	Ongoing	A categorical exclusion was used for analysis
Phelps Dodge Karger II Project Mining Plan of Operation	Ongoing	An environmental assessment was used for analysis
Phelps Dodge Mining Co.	Ongoing	Mining Plan of Operations; an environmental assessment was used for analysis
EPA- Luttrell Repository	Ongoing	2014 & 2015: A two year work plan is being implemented so that the cost of opening Luttrell Repository and treatment of waste water resultant from opening the repository can be saved and used to further remedial actions: this approach requires consolidation of mine waste into stockpiles to be hauled to Luttrell Repository in 2015. In 2014, EPA conducted clearing & grubbing so as to establish transport roads for Off Road Waste Hauling Vehicles at the National Extension mine waste site (most accessible from the Basin Side and near the ridge) and the Bunker Hill mine group (located South of Rimini).
Silver Crescent Mine	Dormant	Banner Creek Drainage. T8N, R5W, Sections 21, 22, 28. Currently dormant activity. Forest Service is holding bond.

Table 6 - Reasonably Foreseeable Activities

Project/Activity Name	Decision Date and/or Status	Brief Description
Golden Anchor Road	Foreseeable	Aquatic Organism Passage Legacy Road: Road 4100 construct a 60' span spill thru bridge over the existing ford on the Little Blackfoot River.
Ten Mile Road Improvement Project (County Route 695) also known as Rimini Road.	Foreseeable	Improve road way from the junction with Hwy 12 to the junction with the Chessman Reservoir intersection, just over 6 miles in length. Improvements would include replacement of three bridges and associated railings, bridge drainage improvements, upgrading road signs, re-alignment of road segments, and paving.
Telegraph Creek MPB Salvage and Pre-commercial Thinning	Foreseeable	Approximately 6,335 acres are proposed for treatment. About 1,867 acres would be pre-commercial thinned (15-40 year old stands). The remaining acres are mature stands with high MPB mortality, which would be treated with chainsaws, prescribed fire, masticators, feller-bunchers, and cable logging equipment. Primary prescription would be regeneration harvest. About 7 miles on new roads and 5 miles of reconstructed roads are needed. Post treatment may include about 3,800 acres of under-burn, site prep burn, broadcast burn, jackpot burn, and hand pile & burn.
Rimini Substation	Foreseeable	Baxendale Fire Dept.is proposing to pour a concrete slab and construct a 3 bay fire station to store firefighting equipment and to utilize existing underground tanks for the filling of fire engines during suppression activities.
Tenmile South Helena	Foreseeable	The purpose of the project is to maintain consistent quantity and quality of water within the municipal watershed and improve conditions for public and firefighter safety across the landscape in the event of a wildfire. Approximately 25,027 acres are proposed for treatment (24,020 on NFS Lands and 1,007 on BLM Lands) which would include a combination of commercial harvest of trees, non-commercial vegetation treatments and prescribed fire.
East Deerlodge Valley Landscape Restoration Management	Foreseeable	Beaverhead-Deerlodge NF. Purpose is to achieve Forest Plan Goals including Timber management, Aquatic Improvement, Wildlife Habitat improvement. Proposed activities include timber salvage, commercial thinning, sediment reduction, fish passage, road and trail decommissioning. Project includes 2,038 acres of commercial harvest, 340 acres of commercial thinning and commercial harvest, and 162 acres of commercial thinning.
Mineral Plan of Operations	Foreseeable	It is reasonably foreseeable that the Divide Travel Plan area will see continued interest in mineral activity, which will precipitate the submission of Plan of Operations proposals to the HNF, likely at similar activity scales and rates experienced presently.

Appendix C. Wildlife Additions

Wildlife Analysis Approach

The following table describes how each wildlife parameter is addressed. Some of the parameters have been described in the main body of the in the Wildlife Report, while others are either assumed to be unaffected by travel management or are assumed to be addressed under other parameters. The table, below, provides the rationale for the level of analysis applied to each wildlife parameter.

Table 7 - Wildlife Analysis Approach

Wildlife Parameter	Discussion: Rationale for Analysis
Habitat Components and Processes	
Fragmentation	The Continental Divide region of the Helena NF is an inherently fragmented landscape of alternating grasslands and forest with riparian areas serving as focal habitats. These patterns are constantly shifting as a result of natural processes and human enterprisies: natural succession, fire, insect outbreaks, climate shifts, timber harvest, livestock grazing, human settlement, water diversion and impoundment, road building. Roads are one component that can fragment the landscape for certain species and alter patterns of habitat use, movement, and general behavior patterns for many others. The character and intensity of road impacts will depend on the species in question, the nature of local habitats, and the kinds of roads involved. Roads generally have less of a fragmentation effect on species with larger home ranges and more mobility. Diminutive species with small home ranges and limited mobility generally are more susceptible to fragmentation effects created by roads. Traffic volume on any segment of the road system is key to its influence on habitat effectiveness. The *Wildlife Specialist Report* addresses fragmentation and the potential effects of proposed road closures
Habitat Loss	The presence of roads on the landscape amounts to a direct loss of wildlife habitat. Although a majority of Forest roads are narrow (often 12 feet or less), and the sinuous strips of the ground they occupy represent a relatively minor depletion of habitat, others are broad and flanked by roadside environments in which original habitat is substantially altered. Even where roads have been closed to all motorized uses, functional habitat is usually slow to return, given the hard-packed substrate and frequent use of roadbeds as travelways by wildlife, livestock, and humans on foot. Roads also provide access for firewood gathering, which results in a loss of habitat for species that use woody debris or snags for any portion of their life cycle. Roads provide avenues for spread of exotic species—most often noxious weeds—that may eventually result in loss of productive habitat. These topics are discussed in the *Wildlife Specialist Report.*
Edge Effects	Roads produce edge effects. Edge effects may extend up to 200 meters into a forest for a major road with a broad, cleared corridor, altering biological communities and ecological processes throughout that zone. In other cases, primitive roads may be so enveloped by surrounding forest or grassland that edge effects are virtually non-existent. For more ample roadways in forest environments, edge zones tend to be drier and less shady than interior forests and tend to favor shade-intolerant plants. Edge-adapted species (including many

Wildlife Parameter	Discussion: Rationale for Analysis
	terrestrial game species) benefit from increases in edge whereas species dependent on true interior habitat may be unable to maintain their populations in landscapes where edge is abundant. The *Wildlife Specialist Report* discusses edge effects in terms of current conditions and the evolution of edges in road corridors closed to motorized uses.
Riparian Habitats	Riparian habitats have been altered from historic conditions by mining, livestock grazing, road construction, stream diversion, impoundment, and decline of the beaver. These are habitats that, because of their elevated levels of productivity and biotic diversity, tend to focus wildlife activity regardless of surrounding habitat structure. Forested riparian sites amidst surrounding grassland/shrubland supply cover and food for a variety of resident species (as well as for migrating birds in the fall) and they serve as movement corridors for forest species. Riparian habitats are important also as reproductive areas for amphibians. Many roads follow stream corridors, resulting in direct loss of habitat, stream sedimentation, and displacement of wildlife species. As well, streams are often desirable places to camp, leading to trampling of vegetation, soil compaction, and disruption of local wildlife habitat use. The *Wildlife Specialist Report* addresses effects on riparian habitats.
Dispersal, Habitat Linkage, and Movement across the Landscape	The Divide has always been an inherently fragmented landscape of alternating grasslands, forests, and local riparian sites. Historically, however, habitats were sufficiently linked by direct connection or proximity that species specialized for one habitat or another (marten or goshawks, for example) were able to move across the landscape. Shifts in habitat patch size and connectivity were generated by fire, insect outbreaks, and other natural phenomena. Since the 1860's, mining, roads, and other long-term human-generated features on the landscape have created rigid movement barriers and impacted riparian areas. These features have reduced the size of habitat patches in which wildlife species are able to operate free from human interference and thus have impeded the ability of a number of species to move through the landscape. The role of roads and trails in this process is analyzed in the *Wildlife Specialist Report*.
Snags and Logs	Until recently, large snags and logs have been relatively uncommon over much of the Divide landscape because of the relatively young/middle-aged forest structure (80-120 years old) produced by widespread logging and fires in the late 19th and early 20th centuries. Exceptions have been in pockets of advanced mature and old-growth forest unaffected by historic fire and logging, a few drainagers subject to winter kill in the late 1980's (Jericho Mtn, upper Snowshoe Crk, upper Telegraph Crk), and a couple relatively recent mid-sized fires (Breatrap, MacDonald Pass). Numbers of snags and logs have now increased dramatically across the Travel Plan Area as a result of the mountain pine beetle epidemic. Most mortality is occurring in mature lodgeople and ponderosa pine, but whitebark and limber pine are affected as well. The *Wildlife Specialist Report* addresses this topic.
Noxious Weeds	Noxious weeds impact wildlife by reducing habitat availability where the weeds successfully outcompete native vegetation. The Noxious Weeds Section in the *EIS* analyzes the effects of the various alternatives on noxious weeds. Weeds are discussed in the Wildlife Specialist Report only as they relate tangentially to other habitat components and processes (elk winter range, ATV off-trail use, livestock grazing, etc.).
Unique Features	Several wildlife species utilize unique features such as cliffs, caves, and talus slopes. These features are not analyzed as separate topics in the Wildlife Specialist Report. Rather, they are discussed in accounts of the species that use them [wolverine denning habitat, for example].
Migratory Birds	

Wildlife Parameter	Discussion: Rationale for Analysis
Migratory Landbirds and Shorebirds	Forest Service management direction since 2000 has been to analyze the role of individual resource management projects in protecting, enhancing, or threatenening populations of migratory landbirds and shorebirds and their habitats. Roads and motor trails can affect local bird populations by altering suitable habitat in road and trail corridors and by funneling human disturbance into sensitive habitat areas. Rather than generalizing as to potential effects on migratory birds as a single group or looking at several hundred individual species, a majority of which are little affected by the Forest road and trail network,the *Wildlife Specialist Report* focuses on 19 migratory bird species of special concern (as designated by the USFWS and MFWP). The analysis considers the likelihood of the species actually nesting in the road or motor trail corridor and the degree to which vehicles and other human activities in the corridor might affect the birds under each project alternative. Data for species assessments has come from the scientific literature supplemented by field observation in the Plan Area.
Big Game	
Elk	The elk is a key species on the Helena NF—as an object of public fascination and scrutiny and as a management indicator for other big game species that depend on the same diverse habitat spectrum. Elk make use of a variety of habitats and habitat components, and volumnous research into their use of the landscape provides insights into habitat used by numerous other species. The *Forest Plan* identifies the components of elk habitat that need to be addressed with regard to travel planning—namely, open road patterns during the hunting season; hiding cover on summer range; thermal cover, roads, and snowmobile routes on winter range. Thermal and hiding cover are not key elements of this analysis, which focuses on the influence of motorized routes. Elk are known to respond to road density on summer range (not a *Forest Plan* standard) and to the distribution pattern of open roads that provide hunter access in the fall (which *is* a *Forest Plan* standard). These aspects are addressed by habitat effectiveness and elk security area analyses. Elk and elk habitat are dissected at length in the *Wildlife Specialist Report*, and this analysis is carried forward into the *EIS*. Additional discussion applicable to elk can be found throughout the *Specialist Report*, in particular, in sections on *Connectivity and Fragmentation* and *Key Local Areas.* Elk population parameters are measured annually by MFWP via winter range aerial cenuses, hunter check stations, hunter surveys, and a variety of field studies.
Mule Deer	The mule deer is an adaptable and resilient species. In recent decades population numbers have moved up and down in roughly 20 year cycles. Low points occurred in the 1970s and mid 1990s. As of 2014, populations were once again in decline throughout much of Montana. Nonetheless, mule deer remain widespread and common in the Divide landscape and adjacent non-Forest lands. Because of shifting abundances in the mule deer population, it behooves the Helena NF to monitor and manage mule deer habitat with some attention to detail. These efforts compliment population monitoring by MFWP. Like elk, mule deer serve as a *Forest Plan* indicator for big game habitat. Aside from this designation, however, the *Forest Plan* provides little specific management direction for deer. The *Plan* assumes that management for elk will take care of the needs of deer. While mule deer exhibit behavior and habitat use patterns somewhat different from those of elk, many key habitat components (productive foraging areas, hiding cover, riparian sites, road density, human-free areas) are important to both. Consequently, effects analyses for elk are assumed

Wildlife Parameter	Discussion: Rationale for Analysis
	to be valid for elucidating potential effects of Travel Plan alternatives on mule deer as well. These analyses, along with additional discussion relevant to mule deer, are presented in the Wildlife Specialist Report.
Moose	The Shiras moose is native to Montana, although it now appears to inhabit many areas where it was not observed in the 19th century. As of the 1990s moose had moved as far south as northern Utah and Colorado. Lately, however, moose populations have been receding noticeably in parts of Montana (and elsewhere across the country). Moose are found throughout the Divide landscape, but they are uncommon—a function of their solitary nature coupled with spotty distribution of key habitat around which they focus their activity. Although they move through nearly all types of mountainous habitats, moose seek out productive riparian and subirrigated habitats as foraging sites and spend a large portion of their time there. They will feed on submerged aquatic plants and tall forbs in summer but, above all, they are browsers on tall and mid-sized shrubs. The *Forest Plan* addresses the importance of riparian shrub communities to moose and directs that these habitats be monitored and preserved. There are, however, no anticipated effects on the quantity or diversity of browse available to moose as a result of actions proposed by Travel Plan alternatives. Moose vary in their tolerance of human activity associated with open roads: some give road corridors a wide berth during daylight hours, while others seem little bothered by them. Primary effects of travel management arise from (1) decrease in habitat effectiveness for individuals averse to open roads and motor trails and (2) susceptibility of other moose to poaching or accidental shooting because of their tendency to select foraging sites without regard to the presence of open roads. Discussion of site-specific effects of travel routes on riparian habitat and vulnerability of elk to hunting apply to moose as well.
Bighorn Sheep	Bighorn sheep are have not been identified as resident in the Divide landscape since the early 20th century. The wild sheep, once common, fell victim to early market and subsistence hunting and to disease introduced with dometic sheep. MFWP currently has no plans for reintroduction of bighorn sheep in this area. Consequently, they will not be analyzed further for this project.
Whitetail Deer	As with mule deer, white-tailed deer population numbers tend to cycle periodically; and as with mule deer, their populations are currently in decline in much of the state. A large percentage of whitetail habitat is at lower elevation in riparian areas and valleylands, and thus these deer are much less common on the National Forest than mule deer. Analyses of Elk, Mule Deer, and Riparian Habitats serve as surrogates for effects of travel management on whitetail deer.
Other Hunted and Trapped Species	Mountain lion and black bear hunting are unique enterprises, each of which requires an individual approach different from what works for elk and deer. But in the end, these species are affected by the Forest road and trail network in much the same way as are elk—and the analysis of roads for elk security applies to them as well. See also, the discussion of grizzly bears, road density, and unroaded habitat enclaves. For a discussion of the interrelationship of motor routes and trapping, see the sections pertaining to forest carnivores—specifically, wolverine, fisher, and marten.
Threatened, Endangered, and Proposed Species	
Grizzly Bear	In 2002, the northern half of the Divide landscape (and the Travel Plan Area) was classified as a “Grizzly Bear Distribution Zone”—a region outside of the NCDE Recovery Zone in which grizzlies were known to be consistently present. In 2013, the southern half of the landscape

Wildlife Parameter	Discussion: Rationale for Analysis
	was added to the Distribution Zone as well. The resident grizzly bear population in the Distribution Zone appears to be very small, and the bears are seldom observed. The USFWS feels that the primary management elements with potential to adversely impact grizzlies in the Distribution Zone are livestock grazing, sanitation (trash, food storage), and human access management (primarily roads and trails). Of these, access management is directly relevant to travel planning. With regard to access management, the Helena NF gauges effects on grizzly bears throughout this area according to the *Interagency Grizzly Bear Committee (IGBC) Guidelines* (1986). We have used *IGBC* "Management Situation 5" as the most appropriate guide and have focused on the linkage zone function of the Divide landscape. To this end, we have looked at open road densities and the size and distribution of unroaded habitat refugia (areas larger than 2,500 acres with all boundaries more than 0.3 miles from open roads or motor trails) to estimate the relative impacts of alternatives.
Canada Lynx	Effects on lynx are assessed according to standards and guidelines in the *Northern Rockies Lynx Management Direction (NRLMD)* (2007)—now a part of the *Forest Plan*. Of the 8 guidelines and standards that deal with roads and motor trails, only two are relevant to Travel Plan alternatives, since no new roads are proposed and the few new authorized motor trails would follow existing motor routes. The applicable guidelines address snowmobile routes and the potential for creating access trails for lynx competitors through snow compaction. The assessment thus concerns itself primarily with the mileage and distribution of snowmobile routes under different alternatives and with the potential for snowmobile play areas in lynx habitat. The *NRLMD* does not address open road densities or the size and distribution of unroaded habitat refugia in a quantitative manner with regard to lynx. So while I have taken these factors into account, I have done so only by refering to quantitative assessments in sections for Grizzly Bears, Elk, and Connectivity.
Wolverine	Wolverines are known to occupy the Travel Plan Area—a conclusion derived from (1) systematic tracking and DNA analysis over the last 5 years and (2) earlier observations and tracking surveys. In 2013, the USFWS proposed listing the wolverine as a *threatened species* under the Endangered Species Act. Rationale followed from the methodical shrinking of snowpack in high elevation basins where wolverines establish natal dens. Related to this, human access to these areas via snowmobile and all-terrain vehicles in winter or early spring could disturb dening female wolverines and young at these key sites. Roads and trails (especially snowmobile trails) increase vulnerability of local wolverine populations by reducing the scope of suitable habitat and increasing the chance of negative encounters with humans. The size of roadless refuges and the extent to which snowmobile routes probe into potential wolverine natal denning areas are used to gauge impacts. The analysis is presented in the main body of the *Widlife Specialist Report*.
Sensitive Species	
Wolf	Wolf packs have occupied the Divide landscape and areas adjacent to it in the valleys and foothills since 1995: 5 packs were known to have been present in this immediate area between 1995 and 2007. Since then, several new packs have formed within reach of the Travel Plan Area, but all have been removed or greatly reduced by USDA Wildlife Services because of their propensity for preying on domestic livestock. A number of wolves have been observed in or near the Plan Area in the last couple years (2010-2014), but evidence of pack formation has been inconclusive. The USFWS and MFWP have monitored all of the known

Wildlife Parameter	Discussion: Rationale for Analysis
	Divide packs intensively, and the movements and actions of these wolves have been well documented. Helena NF biologists have monitored their presence on National Forest lands, particularly with regard to their activity on grazing allotments. In this analysis, potential effects of travel planning on wolves are assessed in terms of parameters outlined in the *Wolf Recovery Plan* (1987) and the *Montana Wolf Conservation and Management Plan* (2003): Road density, unroaded habitat blocks, and the potential for human disturbance of denning and rendezvous sites.
Fisher	Fisher are possibly present in the Plan Area—though in very low numbers. Impacts are measured in terms of open road density in modeled fisher habitat—both as an indicator of access available to trappers on snowmobiles in winter and the area from which firewood cutters can remove large snags (important habitat components for fishers). The analysis is presented in the main body of the *Widlife Specialist Report.*
Black-backed Woodpecker	There has been little habitat capable of sustaining local black-backed woodpecker populations in the Divide landscape in the past century. The last large fires that created an abundance of suitable dead-tree habitat occurred in the late 19th and early 20th centuries. The MacDonald Pass fire in 2009 and the Beartrap Gulch fire in the 1960's created a few hundred acres of local habitat, but these were isolated events. Black-backed woodpeckers were reported in the MacDonald Pass burn in 2010 and 2011. Ongoing bark beetle infestations are creating an abundance of dead tree habitat across the landscape. While this plethora of new snags is proving to be a boon for several woodpecker species (hairy, downy, pileated; flickers) it does not appear to be attracting black-backed woodpeckers as would fire-generated snag arrays. Any effects of travel management will be indirect and measured in terms of roadside corridor available to firewood cutters. The analysis is in the main body of the *Widlife Specialist Report*.
Western Boreal Toad	Recreational impacts, including road and trail development and OHV use, affect boreal toads to a degree. Certain roads serve as travel impediments, and the toads are more susceptible to mortality from vehicles than are most mammals and birds. While boreal toads range through a variety of upland habitats, they concentrate around riparian/aquatic breeding sites. Potential effects, therefore, are assessed primarily in terms of road miles in Riparian Habitat Conservation Areas (RHCAs). The analysis is found in the main body of the *Widlife Specialist Report.*
Peregrine Falcon	Falcon eyries are located on high cliffs, often near water. Peregrine falcons were extirpated from the Divide landscape in the mid 20th century, and no new occupied eyries have been located in the landscape since the falcons have become re-established in and around the Helena NF (almost entirely in the Big Belt Range) in the early 1990's. No quantitative analysis is needed at this point.
Bald Eagle	No active bald eagle nests have been located on HNF lands in the Divide landscape since the rejuvination of local eagle populations over the last 3 decades. All known nests near the landscape are in the Little Blackfoot drainage on private land to the west. Most resident eagles on the Forest are located along the Missouri River in the Big Belt Range and along the Big Blackfoot River. No quantitative analysis has been done here.

Wildlife Parameter	Discussion: Rationale for Analysis
Flammulated Owl	Flammulated owls utilize open park-like conifer forests, especially ponderosa pine. They require an adequate forage base of large insects and a large snag component. Potential habitat does exist in the Divide landscape, and the birds are known to be present—primarily along the Mount Helena Ridge outside the Travel Plan Area. Effects on these owls are assessed in terms of the likelihood of snag removal along roads by firewood cutters in modeled flammulated owl habitat. This discussion is presented in the main body of the Widlife Report.
Townsend's Big-eared Bat	Key components for these bats are caves, mine openings, and a variety of smaller rock cavities. There is a possibility that they are present in the Divide landscape, but none have been found to date. The potential for any of the proposed Travel Plan alternatives generating effects relevant to big-eared bats is scant, and so they are not analyzed in the *Wildlife Specialist Report*.
Northern Leopard Frog	Leopard frogs have not been found in or near the Divide landscape since the early 1990's, and it is likely that they have been extirpated from the area. The analysis of roads in riparian areas done for the western toad will suffice to quantify any potential impacts on leopard frogs, should they be present.
Harlequin Duck	Harlequin ducks have never been identified on the Helena NF in the Divide landscape, although they have been reported, rarely, in transit further west on the lower Little Blackfoot River. No analysis was done for harlequin ducks.
Northern Bog Lemming	The northern bog lemming has not been identified in the Divide landscape. Nor have we identified any blocks of suitable habitat (sphagnum bogland) large enough to support them. Analyses addressing riparian habitats and other riparian-dependent species will suffice for this species.
Columbia Sharp-tailed Grouse	The Columbian sharp-tailed grouse is not present in the Plan Area and was not analyzed.
Management Indicator Species	
Pileated Woodpecker	The pileated woodpecker is identified as an old growth-dependent MIS in the *Forest Plan*. Throughout the Divide landscape, however, pileated woodpeckers are usually found in non-old-growth habitat, with large nesting trees (>30" dbh) being the key habitat component. Availability of insect-prone feeding substrate (typically dead or dying trees) is also important. Observation of pileated woodpeckers is usually fortuitous. The location of observations (of the woodpeckers, by sight or sound, and of their characteristic excavations in trees) are noted and mapped. Observations of pileated woodpeckers are increasing in the Divide landscape as dead trees produced by the mountain pine beetle outbreak continue to proliferate. Pileated woodpecker habitat is analyzed in the main body of the Wildlife Specialist Report.
Northern Goshawk	The *Forest Plan* designates the goshawk as an indicator of old-growth forest, although it is more often found in non-old-growth habitats on the the Helena NF. Goshawks maintain large home ranges and make use of a variety of habitats within them. They are most commonly associated with mature forest, and they require closed-canopied mature stands for nesting and successfully fledging young. There are a number of known nest sites and territories within the Plan Area. Motorized and non-motorized use can affect nesting goshawks if the activity is too close to a nest site. Known goshawk nesting teritories are monitored in the field each year, and active nests are checked as many times as needed to determine nesting success. New territories are monitored whenever they are identified. Because goshawks move to new nest sites each year, we are not able to locate all active nests in a given year, but the presence of goshawks on a territory can usually be verified. The mountain pine

Wildlife Parameter	Discussion: Rationale for Analysis
	beetle outbreak has dramatically affected the configuration of goshawk habitat within the Plan Area (and across the Forest as a whole). The goshawk is analyzed in the main body of the *Wildlife Specialist Report.*
Hairy Woodpecker	The hairy woodpecker is identified as a snag dependent MIS in the *Forest Plan.* Hairy woodpeckers are relatively common throughout a variety of habitats in the project area, and their numbers are increasing noticeably in forest stands killed by the mountain pine beetles. They are further analyzed in the main body of the *Wildlife Specialist Report.*
Marten	The marten is an indicator for the quality of large continuous blocks of mature cover. Marten use mature/ old-growth spruce/fir and lodgepole pine stands for denning. Stumps and downed logs are critical components. Fragmentation of coniferous cover through historical and recent logging and roading has reduced habitat suitability, and trapping has reduced marten numbers directly. Ongoing bark beetle infestation may have mixed implications for marten—increasing the availability of large snags and logs but reducing the availability of mature forest overstory. Effects of travel management on marten are analyzed in the main text of the *Wildlife Specialist Report*. The primary habitat parameter is the availability of mature forest with abundant coarse woody debris. Field observation of marten comes from winter tracking surveys, observation during general wildlife surveys, and annual survey work by MFWP.
Hunted Species Group	The hunted species group is summarized above under *Big Game*.
Threatened and Endangered Species Group	The listing and classification of this group has changed since its designation in the *Forest Plan* in 1986. Most of the group has been delisted and is now covered in the section on *Sensitive Species* (bald eagle, peregrine falcon, wolf). One species (grizzly bear) remains listed and is included in the section on *Threatened and Endangered Species* above. The Canada lynx, which is now listed as a threatened species, was not included in the original *Forest Plan* grouping.
Other Road Analysis Issues	
Recreation	Effects of recreation that are facilitated by road and trail use are described in the *Wildlife Specialist Report* under the respective species for which effects may be relevant.
Disruption/Displacement	Disruption and displacement associated with road and trail use are described in the *Wildlife Specialist Report* under the respective species for which effects may be present.
Direct Mortality	Direct mortality associated with roads is described in the *Wildlife Specialist Report* under the respective species for which effects may be present.

Species of Concern

Status of Species of Concern known or suspected to be present in the Divide Landscape of the Helena National Forest: These include Threatened, Endangered, and Proposed Species (Endangered Species Act); Sensitive Species (Forest Service Region 1); and Species of Concern (MT Natural Heritage Program; MT Fish, Wildlife and Parks). The list is current as of May 2009.

Table 8 - Species of Concern Status

Species	USFS Northern Region Listing[1]	MNHP State Ranking[2]	MFWP Species of Concern	Status in the Divide Landscape[3]
Mammals				
Grizzly Bear	threatened	S3	listed	Resident and transient in the Divide landscape in very low numbers
Canada Lynx	threatened	S3	listed	Transient and apparently resident in the Divide landscape in very low numbers
Wolverine	sensitive	S2	listed	Transient and resident in the Divide landscape, but rare
Gray Wolf	sensitive	S3	listed	Transient and sporadically resident across the landscape in relatively low numbers
Fisher	sensitive	S3	listed	Rarely observed: status in the Divide landscape unknown
Northern Bog Lemming	sensitive	S2	listed	Presence suspected in the Divide landscape: not yet identified on the HNF
Townsends Big-eared Bat	sensitive	S2	listed	Presence suspected in the Divide landscape: not yet identified on the HNF
Black-tailed Prairie Dog	-	S3	-	Not known on the HNF: local populations on adjacent lands are highly fragmented
Hoary Bat	-	S3	-	Not identified on the HNF: suspected on adjacent lands
Preble's Shrew	-	S3	listed	Presence suspected: not yet identified on the HNF

[1] The 2 threatened species are listed as such by the USFWS under the Endangered Species Act. USFS Region 1 follows suit in its classification of these species.

[2] MT Natural Heritage Program State Rankings. **S1** = *At high risk* because of *extremely limited* and potentially declining numbers and/or distribution, making it *highly vulnerable* to extirpation; **S2** = *At risk* because of *very limited* and potentially declining numbers and/or distribution, making it *vulnerable* to extirpation; **S3** = *Potentially at risk* because of limited and potentially declining numbers and/or distribution, even though it may be abundant in some areas; **S5** = Common, widespread, and abundant—not vulnerable in most of its range. **"B"** denotes breeding populations, **"N"** non-breeding (wintering) populations.

[3] Information on species distribution in the Divide landscape has come from Skaar 2003 (Montana Bird Distribution), Foresman 2001 (The Wild Mammals of Montana), Werner *et al.* 2004 (Amphibians and Reptiles of Montana), the Montana Heritage tracker (http://mtnhp.org/tracker), and Helena National Forest field observation records.

Species	USFS Northern Region Listing[1]	MNHP State Ranking[2]	MFWP Species of Concern	Status in the Divide Landscape[3]
Bighorn Sheep	sensitive	-	-	Present in the Big Belts and Elkhorn Ranges and further north along the Continental Divide
Birds				
Peregrine Falcon	sensitive	S2B	listed	Transient: no known eyries in the Divide landscape
Bald Eagle	sensitive	S3	listed	Nests rare in the Divide landscape: all on private land.
Black-backed Woodpecker	sensitive	S2	listed	Resident on the HNF: population numbers highly variable over time
Flammulated Owl	sensitive	S3B	listed	Resident in the Divide landscape in low numbers
Harlequin Duck	sensitive	S2B	listed	Not detected on the HNF: rare seasonal migrant in adjacent areas
Loggerhead Shrike	sensitive	S3B	listed	Not detected on the HNF: rarely observed on adjacent lands
Baird's Sparrow	sensitive	S2B	listed	Rare seasonal migrant
Long-billed Curlew	sensitive	S2B	listed	Not detected on the HNF: uncommon on adjacent lands
Pileated Woodpecker	indicator species	S3	-	Resident in Divide forests with a large tree component, but uncommon
Ferruginous Hawk	-	S3B	listed	Uncommon seasonal migrant
Swainson's Hawk	-	S3B	listed	Resident in low numbers
Northern Goshawk	indicator species	S3	listed	Widespread resident across the Divide lanscape: numbers inherently low
Brown Creeper	-	S3	-	Widespread but relatively uncommon in mature forests across the landscape
Cassin's Finch	-	S3	-	Relatively common in the Divide landscape and adjacent lands
Veery	-	S3B	-	Resident and fairly common in riparian shrub habitats
Black Rosy-Finch	-	S2	listed	Winter resident/transient
Gray-Crowned Rosy-Finch	-	S5N	listed	Winter resident/transient
Mountain Plover	-	S2B	listed	Not reported on the HNF: breeding in adjacent areas in very low numbers
Great Blue Heron	-	S3	-	Resident and often observed: suitable aquatic habitat is highly localized
Bobolink	-	S2B	listed	May be present on the HNF: breeding in adjacent areas in low numbers

Species	USFS Northern Region Listing[1]	MNHP State Ranking[2]	MFWP Species of Concern	Status in the Divide Landscape[3]
Lewis's Woodpecker	-	S2B	listed	Present in the Divide landscape in low numbers
Clark's Nutcracker	-	S3	-	Relatively common in the Divide landscape
Brewer's Sparrow	-	S2B	listed	Resident in the Divide landscape in low numbers
Great Gray Owl	-	S3	listed	Uncommon but widespread on the HNF and in the Divide landscape
Golden Eagle	-	S3	-	Resident and transient: numbers inherently low
Amphibians				
Western Toad	sensitive	S2	listed	Relatively common in the Divide landscape: local populations fragmented
Northern Leopard Frog	sensitive	S1	listed	Extirpated: not observed on the HNF or adjacent lands in nearly 2 decades
Plains Spadefoot	sensitive	S3	listed	Not present in the Divide landscape or adjacent lands
Reptiles				
none	-	-	-	No reptiles of concern are present in the Divide landscape

Movement of Elk within Seasonal Home Ranges

The following table summarizes distances moved by elk within seasonal home ranges as reported in a number of different field studies. The average of these distances provides a rough indication as to how far elk anchored to National Forest land (for bedding sites, shelter, or escape cover) are likely to move out beyond Forest boundaries during the course of normal daily foraging activity and still be able to return to the Forest on a regular basis. This, in turn, provides rationale for delineating the bounds of National Forest elk herd units off the Forest. Off-Forest use on this order applies primarily to elk on winter range, when they are most likely to be centering activity in low elevation foothills and valleys.

Table 9 - Distances of Elk Movement

Study Areas	Researchers	Parameters Measured	Miles Moved
West-central Alberta	Frair *et al.* 2005	Distance moved by elk actively relocating	0.94 – 1.18
Southeast British Columbia	Poole and Mowat 2005	Winter range diameter	2.22
Northwest Montana	Vore and Schmidt 2001	Distance between daily locations	0.19 – 1.09
Western Oregon	Cole *et al.* 1997	Core area diameter	1.22 – 1.93
“	“	Distance between weekly locations	1.45 – 1.83
West-central Montana	Hurley 1994	Distance between radio-locations (about every 3 days)	1.20 – 1.83
Central Montana	Canfield 1988	Mean daily home range diameter	1.33
West-central Montana	Edge and Marcum 1985	Distance between radio-locations (every few days)	0.42 – 0.92
Northern California	Bowyer 1981	Mean distance moved in 24 hours	1.49
“	“	Average home range diameter	1.40
Northern Utah	Collins *et al.* 1978	High-end distance traveled between bedding and feeding sites	1.24
West-central Montana	Beall 1977	Distance between daytime beds and nightly feeding areas	2.0 – 3.0

Average Distances Moved by Elk:

Low Average Distance	1.17 miles	(7 low-end values only)
Mid Average Distance	1.41 miles	(all 19 values)
High Average Distance	1.56 miles	(7 high-end values only)

Population Viability Assessment

The status of wildlife populations (as we currently understand their distribution on the Helena National Forest) and wildlife habitats are examined in this section in order to address *Forest Plan* and Agency requirements that: (1) "viable populations of existing native and desirable non-native plant and animal species are maintained" (*Forest Plan* II/17) and (2) management activities do not cause a trend towards ESA listing for species that have been identified as *sensitive* by the Forest Service in in USFS Region 1.

Summary of Population Viability Status

Forest Service Region 1 defines a viable species as "consisting of self-sustaining populations that are well distributed throughout the species range." Self-sustaining populations are "sufficiently large, and have sufficient genetic diversity to display the array of life history strategies and forms that will provide for their persistence and adaptability in the planning area over time" (Samson 2006). Table **10** summarizes the type of data available for each MIS and sensitive species known to be regularly present or, in the case of the fisher, potentially present in the Divide Travel Plan Area. Discussion of other sensitive species not included in the following table can be found in the main body of the *Wildlife Specialist Report and Biological Evaluation.*

Table 10 - Sources for Determining Population Viability

Indicator/ Sensitive Species	Presence/ Absence Surveys by Protocol	Presence/ Absence Surveys Random	Intermittent Species Observations	Forest-wide Habitat Modeling	Region 1 Conservation Assessment	Habitat Surveys
Elk	•	•	•	•		•
Mule Deer	•	•	•	•		•
American Marten			•	•	•	•
Northern Goshawk	•	•	•	•	•	•
Pileated Woodpecker	•	•	•	•	•	•
Hairy Woodpecker	•	•	•	•		•
Black-backed Woodpecker	•	•	•	•	•	•
Flammulated Owl	•			•	•	•
Boreal Toad		•	•			•
Fisher	•			•	•	•
Wolverine	•	•	•		•	
Wolf		•	•		•	

"•" indicates which sources of information were used for each species determination.

Viability ratings for elk and mule deer are based on annual tallies of individuals in the field, usually by MDFWP. Extensive data on suitable habitat is also available for elk and mule deer, through Forest-wide habitat modeling and systematic field surveys. Ratings for goshawk and hairy woodpecker are based on wide-ranging, but less complete, population surveys in the field. This information is sufficient to indicate the general magnitude and distribution of populations in the project area and throughout the *Forest Plan* area. Availability of suitable habitat has been estimated through Forest-wide habitat models, systematic habitat surveys, or both.

Ratings for marten and pileated woodpecker are more problematic. Population information comes primarily through tallies and mapping of fortuitous and, occasionally, targeted field observations. This demonstrates that the species continue to inhabit the planning area, if not the project area, and it provides a rough indication of how they are distributed. But it is a crude estimator of viability. On the other hand, Forest-wide habitat models and general field surveys provide a basis for assessing habitat sufficiency.

Based on discussion in the *Northern Region Viability Protocol (Samson 1997)*, a review of the Northern Region *Viability Committee Report* (Samson 1997), and *Habitat Estimates for Maintaining Viable Populations* (Samson 2006), the following qualitative rating system was applied to populations and habitats of management indicator and sensitive species as a means of assessing population viability (Table **11**).

Table 11 - Rating System for MIS Populations and Viability

Rating	Population Distribution and Condition within Potential Habitat	Potential for Population Interaction and Colonization of Empty Habitat	Probability of Population Persistence over 50–100 years
5	Population widely distributed, robust, and resilient	Few limitations on population interactions	Very High: Population large, widespread, relatively stable, highly resilient
4	Population well distributed; variable population density	Some barriers to population interaction and habitat occupancy	High: Population widespread, resilient; no insurmountable decimating factors or habitat problems
3	Population may be widely but sporadically distributed; variable density within suitable patches	Barriers to interaction result in some persistently empty habitat blocks	Moderate: Population widely but sporadically distributed; key habitat may be limited or vulnerable; decimating factors a potential problem
2	Population segments localized; small but may be persistent	Population segments often isolated; limited routes for interaction and recolonization of empty habitat	Low: Population small, subject to stochastic effects; long-term availability of key habitat uncertain
1	Population segments localized, small, ephemeral	Population segments highly isolated; little possibility of interaction or recolonization of empty habitat	Very Low: Populations very small, habitat limited and unstable; highly vulnerable to stochastic effects

The ratings in Table **12**, which follows, apply to potential habitat for the Helena NF as a whole. In many cases, the Divide Travel Plan Area contributes to maintaining viability of these populations but is not sufficient in and of itself to encompass or support a self-contained viable population or subpopulation. This conclusion comes from research reported in the scientific literature and field observations as to how population size and structure of different species in the Plan Area fit the estimates of what is needed for the species to maintain viability. Given the lack of quantitative data, it is not possible to define a precise timeframe for probability of persistence. But, in general, it is intended to apply to the long term: the probability that the population would persist for 50 to 100 years within the Helena National Forest *Plan* Area (Samson 1997).

Table 12 - MIS and Sensitive Species Potential Habitat for the Helena NF

Indicator/ Sensitive Species	Population Distribution Rating	Population Interaction Rating	Estimated Probability of Population Persistence	Comments
Elk	5	4	5	Elk populations on the Helena NF are robust. Habitat is ubiquitous. These conclusions follow from detailed annual population monitoring by MFWP and extensive habitat surveys by the Helena NF. Local barriers to elk movement are common, but no substantial blocks of elk habitat are isolated. In spite of local habitat problems, elevated predation in some areas, and persistent hunting pressure in others, long-term viability of elk populations is not a concern.
Mule Deer	5	4	5	Mule deer are widely distributed across the Helena NF and surrounding areas. Habitat is ubiquitous. Local impediments to free movement are common, but no substantial blocks of mule deer habitat are isolated. Mule deer often move easily through and inhabit areas of human settlement. Deer populations have cycled up and down over 10-20 year periods for a variety of reasons, but they have never declined to a point where population viability has been at risk. In spite of local habitat problems, predation, and hunting pressure, long-term viability of mule deer populations is not a concern.
American Marten	3	4	4	Primary marten habitat with mature trees and abundant coarse woody debris is patchy but widely distributed in the Travel Plan Area and across the Helena NF. Habitat is most abundant on the Lincoln RD. It is increasing as forests age in areas not affected by mountain pine beetle (mature Douglas-fir, subalpine fir, Engelmann spruce forest). Primary habitat is interconnected by forested travel habitat. Impact of the beetle outbreak is uncertain, as it subtracts mature forest canopy but increases coarse woody debris. Marten are widely distributed, but numbers are unknown. Prospects for long-term viability are good, as long as trapping pressure does not substantially exceed present levels.
Northern Goshawk	4	4	4	Mountain pine beetle is reducing habitat—particularly nesting sites—over extensive areas across the Helena NF. Field surveys indicate that goshawks remain widespread; though nesting success may have decreased. Goshawks are capable of nesting in a variety of mature forest configurations and are adapting to changing forest conditions. Enough suitable nesting habitat will remain to support viable populations; but reduction and fragmentation of habitat may lower population in the mid-term. As mature forest habitats regenerate, goshawk populations will return to previous levels.
Pileated Woodpecker	2	2	2	Pileated woodpeckers are uncommon but persistently present in the Divide landscape. Field observation suggests that they have increased with the pine beetle infestation. The presence of large nesting/roosting trees is the key to their persistence. This habitat component while not overly abundant is common enough across the Forest to ensure the long term viability of pileated woodpeckers.

Indicator/ Sensitive Species	Population Distribution Rating	Population Interaction Rating	Estimated Probability of Population Persistence	Comments
Hairy Woodpecker	5	4	5	Hairy woodpeckers are common and well distributed in all forest habitats with insect-supporting trees and cavity potential on the Helena NF. Populations have increased with the pine beetle outbreak. Potential for suitable habitat persistence and woodpecker population viability over the long term is excellent.
Black-backed Woodpecker	3	4	3	Black-backed woodpeckers occur across the Forest in burned areas. Potential for suitable habitat over the long term is dependent upon fire frequency and intensity and the retention of standing dead trees for 5-7 years after the fire. These woodpeckers do not appear to be making use of the proliferating beetle-killed forests. Though local populations fluctuate dramatically over time, the inevitability of future fires ensures long-term viability throughout the region.
Flammulated Owl	1	2	3	Flammulated owls are present across the Helena NF in low numbers, mostly in mature ponderosa pine and Douglas-fir stands. Suitable habitat is localized and patchy, but widespread. Habitat in the Plan Area has declined over the last century from timber harvest of large trees, suppression of low-intensity understory fires, and, most recently, mountain pine beetle mortality in ponderosa pine stands. Sufficient habitat will remain to sustain a small but viable Forest-wide population.
Boreal Toad	3	3	4	Boreal toads require aquatic/wetland habitat for breeding—sites that are inherently fragmented on the landscape. Adults range widely through upland habitats, allowing interaction between population subgroups. While populations have declined from historic levels, local populations in the Divide landscape have proven persistent. They have not succumbed to chytrid fungus or other maladies that have decimated other amphibians. Retention of healthy aquatic breeding habitat is the key to viability.
Wolverine	3	4	4	The wolverine population on the Helena NF is small but persistent, with the animals ranging through a wide variety of habitats in all 4 Forest landscapes. A small number of wolverines have been documented in the Divide landscape over the past few years. Habitat changes wrought by mountain pine beetles, fire, and forest management are unlikely to suppress the ability of wolverines to persist across the Forest. Travel planning over 2 decades has increased the acreage of non-motorized habitat available to wolverines. Primary limiting factors are trapping mortality and loss of high elevation, snowbound denning habitat due to global warming. At present, such factors on the Helena NF are insufficient to threaten the region-wide viability of wolverines.

Indicator/ Sensitive Species	Population Distribution Rating	Population Interaction Rating	Estimated Probability of Population Persistence	Comments
Fisher	3	4	4	The Divide landscape lies on the fringe of historic fisher range. Primary habitat is limited and patchy, concentrated primarily in mature riparian spruce-fir forests, habitats mostly unaffected by the pine beetle outbreak. Primary habitats are interconnected by forested travel habitat, although much of this is beetle-impacted forest. Fishers are rare in the Divide Travel Plan area; but the adjacent Lincoln RD supports more suitable habitat and what appears to be a viable subpopulation of fishers. The population will continue to be focused in and to persist in this part of the Helena NF.
Northern Rocky Mountain Gray Wolf	4	5	4	The wolf population in and around different parts of the Helena NF is variable and always in a state of flux. Wolves are not habitat-limited. They are highly opportunistic and can rapidly build local populations. They are now limited almost entirely by human-induced mortality in the form of legal hunting, trapping, and predator control operations, as well as by unauthorized shooting and a variety of accidents. Wolf populations in the Blackfoot landscape (Lincoln RD) are particularly robust, and in combination with those of other predators, have suppressed big game populations in that area. Wolves regularly move through the Divide landscape, but persistence of packs has been limited by their focus on private ranchland where they are vulnerable to control actions. Long-term viability is almost entirely a function of the pattern of human-caused mortality, much of which can be readily manipulated.

Samson (2005; 2006), in *A Conservation Assessment of the Northern Goshawk, Black-backed Woodpecker, Flammulated Owl, and Pileated Woodpecker in the Northern Region* and *USDA Forest Service Habitat Estimates For Maintaining Viable Populations of the Northern Goshawk, Black-backed Woodpecker, Flammulated Owl, Pileated Woodpecker, American Marten, and Fisher* (Samson 2005; Samson 2006) summarizes the status of viability for goshawks, black-backed woodpeckers, flammulated owls, pileated woodpeckers, and marten.

The five species considered in this analysis are 'secure' or 'apparently secure' in terms of persistence (NatureServe 2011).

Below (and not above) a threshold of 20 to 30 percent of habitat amounts, effects of fragmentation (i.e., patch size and isolation) are suggested to have a negative impact on species persistence. Effects of habitat fragmentation on birds are described to be less in the western United States in comparison to those reported in seminal and numerous studies in the Midwest and east.

No indication exists that forested ecosystems in the Northern Region have reached the 20 to 30 percent threshold of historic. Forested systems in the Northern Region are more extensive than in historic (approximately 1800) times (Hessburg and Agee 2003; Hessburg et al. 2005).

Comparison of habitat required for a species-specific minimum viable population to that available indicates well-distributed habitat in far excess to that needed, given the natural distribution of species and their habitats as mapped by the Montana Natural Heritage Program, Idaho Birdnet, and the scientific literature.

Regionwide habitat modeling for the marten is restricted by the unavailability of sample-based information on coarse woody debris and the variability evident in marten habitat use. Site-specific

models for marten may need to be adjusted to include resting site and nest site information (based on point observation data) which may or may not influence habitat amount estimates.

Habitat Analysis and Conclusions

Samson (2006) (updated USDA 2008) identifies critical thresholds needed to maintain population viability for selected species within the Northern Region of the Forest Service. Estimates derived from the Helena National Forest Intensified Grid Summary Database (June 2013) indicate that habitat for these selected species exceeds the critical thresholds identified by Samson. The models used to generate estimates are based on Samson (2005, 2006) and USDA (2008).

Table 13 - Habitat Acres Needed to Maintain Viable Populations

Species	Critical Habitat Thresholds (acres) from Samson (2006)	Current Habitat Estimates for the HNF based on Intensified Grid Data
Northern Goshawk	133,436[4] (nesting and foraging)	361,963 (nesting and foraging)
Black-backed Woodpecker	29,405	716,016[5]
Flammulated Owl	8,895	25,231
Pileated Woodpecker	91,923[2]	193,112
American Marten	3,459	293,064
Fisher	74,378	199,905 (summer and winter)

This table gives a sense of the factors important to maintaining viability some of the MIS and sensitive species in the Divide landscape that are particularly vulnerable to habitat loss. At present, the primary factor influencing the viability and quality of habitat for these species is the mountain pine beetle outbreak, which has killed lodgepole and ponderosa pine trees over hundreds of thousands of acres on the Forest. Long-term population viability for these species will be determined by their ability to adapt to the new habitat configurations and to maintain a persistent, if somewhat modest presence, in Helena NF landscapes until forests recover their former structure. Divide Travel Plan alternatives will influence viability of these and most other species listed in Table 13 only in a minimal and peripheral way.

Viability for wolverine, elk and mule deer, hairy woodpeckers, Townsend's big-eared bats, boreal toads, and wolves also appears sound although critical thresholds have not been identified. Elk and mule deer habitat is abundant and well-distributed across the Forest and viability is largely determined through hunting quotas, which are outside the scope of this project. Except for some specific denning-related requirements, wolves and wolverines are opportunistic and habitat generalists, and are little affected by beetle generated changes. Shifts in motorized access under different Travel Plan alternatives may influence habitat use patterns and vulnerability to human presence in different parts of the landscape. But most changes under action alternatives would reduce the potential for human interference and none would be substantial enough to influence population viability.

[4] Samson (2006) critical habitat thresholds for goshawks and pileated woodpeckers does not distinguish between nesting or foraging habitat but rather provides total habitat estimates based on the respective species' needs at the home range scale which includes both nesting and foraging habitat.

[5] Estimates of black-backed woodpecker habitat are based on the 2009 condition survey reports from aerial insect survey data for mountain pine beetle (Gibson 2009). There are approximately 585,557 acres infested by mountain pine beetle in 2009 on the Helena National Forest. As of 2010, mountain pine beetle infestations in the project area are slightly down from 2009, indicating that the outbreak has likely reached its peak. Estimates also include acres burned by wildfires on the Helena National Forest between 2001 and 2010; this is approximately 130,459 acres. Samson's (2006) habitat estimates include both insect and fire-created habitats. There figures most likely underestimate the available habitat as described by Samson (2006) since additional wildfires have occurred since 2010 as well as increased tree mortality associated with the mountain pine beetle.

Hairy woodpeckers use burned areas such as those required by black-backed woodpeckers, but they also inhabit a wide variety of other environments with dead, dying, or other insect-prone trees. Given the widespread availability of foraging and nesting substrate generated by the mountain pine beetle outbreak, habitat for hairy woodpeckers will be overly abundant across the forest for several years and populations have increased accordingly. The woodpeckers would not be measurably affected by travel management. See the *Wildlife Specialist Report and Biological Evaluation* for a more in-depth discussion on the species that may occur in the Plan Area.

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Biological Evaluation Summary

Biological Evaluations are documented Forest Service reviews of the potential effects of proposed actions on threatened, endangered, and sensitive (TES) species (FSM Ch. 2670, Amend. 2600-2005-1). These species groups are designated and managed under two different authorities. "Threatened" and "endangered" species (as well as those "proposed" as such) are listed under the Endangered Species Act (1973) and are overseen by the U.S. Fish and Wildlife Service (USFWS). "Sensitive" species are a matter of Forest Service policy: They are designated by Regional Foresters based on population viability concerns—which may be evidenced by significant downward trends in population numbers, population density, or habitat capability (FSM Ch. 2670, Amend. 2600-2005-1, p. 12).

The biological evaluation of terrestrial wildlife species for the Red Mountain Flume Chessman Reservoir project occurs piecemeal throughout the body of this report wherever the different species of concern are addressed. These include two threatened species (lynx and grizzly bear), one proposed species (wolverine), and 13 sensitive species. Table **14**, below, summarizes the key aspects of the evaluation.

Table 14 - Biological Evaluation Summary

Species	Category	Status
Grizzly Bear	listed threatened	A small number of grizzlies range through and inhabit the Divide landscape. Observations of bears and encounters between bears and humans are uncommon. Enough back-country, non-motorized habitat is available to support a small sub-population of bears over the long term. All action alternatives would increase non-motorized habitat to one degree or another.
Canada Lynx	listed threatened	Lynx are known to be resident in the Divide landscape—having been systematically tracked both north and south of Highway 12. Numbers are very low and, to date, no evidence of breeding has been noted. The bulk of the foraging habitat used by these animals has been in early seral conifer stands rather than in older multi-storied forest. Travel Plan alternatives would have no effect on lynx foraging or denning opportunity. All action alternatives would increase the acreage of non-motorized habitat—reducing potential for encountering humans and access for trappers.
Wolverine	sensitive	Wolverines are known to inhabit the project area in very low numbers. They range widely through a variety of habitats. In winter they often frequent the same mix of early seral and mature forest as lynx. No active natal denning sites have been identified and no breeding noted. All action alternatives would reduce the potential for encounters with humans to one degree or another. None would affect potential natal denning areas.
Gray Wolf	sensitive	Wolves pass through the Divide landscape regularly. Since 1995, several packs have been active in and around the landscape, most having reduced or removed after preying on local livestock. Currently no packs are known to be active in the landscape. Travel Plan action alternatives would reduce potential for negative encounters with humans to varying degrees.
Fisher	sensitive	Fishers have been reported in the Divide landscape only on rare occasions, and only one report has been verified in the last 20 years. Key habitat is limited and patchy. None of the Travel Plan alternatives would affect it.
Townsend's Big-eared Bat	sensitive	Big-eared bats have not been identified in the Divide landscape. Travel Plan alternatives would have no effect on key habitat components for these bats or on the bats themselves should they be present.

Species	Category	Status
Northern Bog Lemming	sensitive	Northern bog lemmings have not been identified in the Divide landscape. Primary habitat (sphagnum bog mat) is rare and highly fragmented. Travel Plan alternatives would have no effect on it.
Bighorn Sheep	sensitive	Bighorn sheep are not present in the Divide landscape. Potential habitat is somewhat fragmented, but sufficient to support a small population should the sheep be reintroduced or migrate in naturally in the future. Travel Plan action alternatives would do nothing to erode this potential.
Black-backed Woodpecker	sensitive	Black-backed woodpeckers focus on aggregations of fire-killed trees. They have not been identified in stands impacted by mountain pine beetle, such as those that now dominate broad areas of the landscape. Travel management as proposed in action alternatives would have no direct or indirect effects on these woodpeckers.
Flammulated Owl	sensitive	Flammulated owls nest and forage in open-grown stands of large ponderosa pine. Some of these stands have been impacted by the pine beetle outbreak, but none of them would be directly affected by Travel Plan alternatives. Given the rarity of suitable flam habitat in the road corridors, any indirect effects from roadside firewood cutting would be minor.
Peregrine Falcon	sensitive	Peregrine falcons have never been documented nesting in the Divide landscape. Travel management proposals would have no effect on ther ability to do so in the future..
Bald Eagle	sensitive	Bald eagles fly over and occasionally stop off in the Divide landscape—perching in large trees, most often near aquatic habitats. No nests have been identified. Travel Plan alternatives would have no effect on bald eagles or their key habitat components.
Harlequin Duck	sensitive	Harlequin ducks have never been identified in the divide landscape. Marginal habitat exists in parts of the upper Little Blackfoot but, so far, it has been unoccupied. Travel Plan alternatives would have no effect on it.
Boreal Toad	sensitive	Boreal toads breed in aquatic habitats across the landscape. Adults range widely through the uplands. Although populations have declined from historic levels, they seem to be holding up well in this area. Travel Plan action alternatives would reduce road mileage in riparian habitat conservation areas and reduce motorized stream crossings. This should be of benefit to the toads, although the result would not be substantial enough to measurably improve population viability.
Leopard Frog	sensitive	Leopard frogs have not been identified in the Divide landscape in nearly 25 years and it is highly unlikely that they are still present. Travel Plan action alternatives would reduce road mileage in key aquatic and riparian habitat.
Plains Spadefoot Toad	sensitive	On the Helena NF, the plains spadefoot has identified only in a small pocket of the northern Big Belt Range. Given their habitat preferences, it is highly unlikely that they are present anywhere in the Divide landscape.

Table **15**, following, presents the determination of "effects" (for T&E species) and "impacts" (for sensitive species). For most species, the various Travel Plan alternatives would have no measurable effect or impact, either because the species are basically not influenced by roads or motor trails or because they are not present in the Travel Plan Area (or present so fleetingly that any effects would be imperceptible). For 5 species, an "effect" or an "impact" is expected—although in all cases these influences are relatively small and would not measurably alter population viability, for better or worse. In a majority of cases, the overall effects of the action alternatives, all of which whittle down the current road and trail system, would be beneficial.

Table 15 - Biological Evaluation Determination of Effects

Species	Effects / Impacts of Alternatives				
	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5
Grizzly Bear	not likely to adversely affect	not likely to adversely affect	not likely to adversely affect	not likely to adversely affect	not likely to adversely affect
Canada Lynx	not likely to adversely affect	not likely to adversely affect	not likely to adversely affect	not likely to adversely affect	not likely to adversely affect
Wolverine	may impact individuals but not population viability	may impact individuals but not population viability	may impact individuals but not population viability	may impact individuals but not population viability	may impact individuals but not population viability
Gray Wolf	no impact	no impact	no impact	no impact	no impact
Fisher	no impact	no impact	no impact	no impact	no impact
Townsend's Big-eared Bat	no impact	no impact	no impact	no impact	no impact
Northern Bog Lemming	no impact	no impact	no impact	no impact	no impact
Bighorn Sheep	no impact	no impact	no impact	no impact	no impact
Black-backed Woodpecker	no impact	no impact	no impact	no impact	no impact
Flammulated Owl	may impact individuals but not population viability	may impact individuals but not population viability	may impact individuals but not population viability	may impact individuals but not population viability	may impact individuals but not population viability
Peregrine Falcon	no impact	no impact	no impact	no impact	no impact
Bald Eagle	no impact	no impact	no impact	no impact	no impact
Harlequin Duck	no impact	no impact	no impact	no impact	no impact
Boreal Toad	may impact individuals but not population viability	may impact individuals but not population viability	may impact individuals but not population viability	may impact individuals but not population viability	may impact individuals but not population viability
Leopard Frog	no impact	no impact	no impact	no impact	no impact
Plains Spadefoot Toad	no impact	no impact	no impact	no impact	no impact

Appendix D – Response to Comments

The regulations for implementing the procedural provisions of the National Environmental Policy Act (NEPA) (40 CFR Part 1503.4 Response to comments), state "An agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively, and shall respond by the following: (1) Modify alternatives including the proposed action; (2) Develop and evaluate alternatives not previously given serious consideration by the agency; (3) Supplement, improve, or modify its analyses; (4) Make factual corrections; and (5) Explain why the comments do not warrant further agency response. This appendix documents the Helena National Forest's response to the comments received on the April 2014 DEIS. Alternatives were modified by refining acres and road mileages; revising, adding or deleting design features; and adding miles of road for decommissioning to Alternative 3 in response to comment. The analyses was improved and modified for most resource areas based upon new information, improved data and to ensure the "hard look" required by NEPA is assured. The following comments from the public and other agencies have helped in our analyses and disclosure of environmental effects.

Table 16 - Comments and Responses to Comments

Comments	Response to Comments
(1) March 9, 2014 To whom it may concern; I would encourage the passage of alternative 3 as described in the divide travel plan. Please keep me posted on the results of the final decision. Kevin Kauska	(1-1) Thank you for your input.
(2) March 14, 2014 Helena National Forest ATTN: Divide Travel Plan 2880 Skyway Drive Helena, MT 59602 Re: Divide Travel Plan Draft Environmental Impact Statement To Whom It May Concern:	(2-1) Thank you for your input.

Comments	Response to Comments
Thank you for the opportunity to comment on the Divide Travel Plan Draft Environmental Impact Statement. We reviewed the Heritage Section (Chapter 3, Pages 125-134), and did not notice any outstanding issues with the methodology or general approach. We appreciate the demonstrated awareness of and sensitivity towards cultural resources and historic properties. We look forward to the receipt of the documentation completed in fulfillment of the Helena National Forest's responsibilities under Section 106 of the National Historic Preservation Act (NHPA), as outlined in 36 C.F.R. 800 and the Region 1 USFS Programmatic Agreement. If you have any questions or concerns, do not hesitate to contact me directly at (406) 444-0388 or kore@mt.gov. Thank you for consulting with us. Sincerely, Kathryn Ore Review and Compliance Officer Montana State Historic Preservation Office	
(3) March 18, 2014 I would like to go on record as opposing any alternative of the Divide Travel Plan that restricts any wheeled access. As important as non-wheeled lands are, there are currently sufficient lands under these restrictions now that are in my opinion underutilized. Greg Kovich 630 Norris Rd. Helena, Mt. 59602	(3-1)Thank you for your input
(4) March 18, 2014	

Comments	Response to Comments
As an avid outdoor user I would like to express my vote for "no action" on the proposals for this area as there are far too many areas closed now in general across our State. There should be a plan to open more roads and areas, not restrict the public's right to our land by any means possible. (4-1) Thank you. Brian Lee 2202 N. Benton Helena, Mt. 59601	(4-1) Thank you for your comment, The Forest Service recognizes the importance of providing motorized use opportunities; the range of alternatives described in the EIS are designed to strike a balance between providing a diverse range of recreation opportunities and resource needs and protection.
(5) March 20, 2014 Hello, I very much enjoy using the Helena National Forest. I'm primarily a Summer guest, but who knows, someday I may want to use the Forest for snowmobiling or whatever motorized use is still legal at that time. I'm also a taxpaying Montana native, a member of the Blue Ribbon Coalition and I own numerous motorized vehicles that I have paid all the fees and taxes that have been asked of me, in return for legal access to my public lands. I very much consider myself an environmentalist, and I do not consider my motorized use an environmental hazard. It almost goes without saying really.. I consider it my right to enjoy this land. Additionally, the presence of motorized users is a service to the others who own or manage the land as well, because we are usually the first ones on these trails in the opening days of Spring and we clear them for all users after us. Not to mention that when someone becomes lost or injured, -including reporting injured cattle and wildlife, and fires-, it is the ATV/motorized users who come to the rescue or make	

Comments	Response to Comments
first reports on something gone wrong in the forest... I also consider us 'the police' out there; simply by being The Ones out in these remote areas, I/we are able to observe and basically 'police' these remote areas that almost never are patrolled by any 'Officials'. There is no way all this land in Montana and inside the Divide Travel Plan Boundary can be patrolled to the satisfaction of those who demand even more limits on motorized access. I myself am out there every Summer, all Summer long, -all over this Divide Travel Plan area, (and further), for over 10 years...- and I/we have never seen so much as one Forest Ranger/Officer on these roads or trails inside the Divide Travel Plan! This is not an exaggeration either. That leaves us to believe the Forest knows that they don't need to be more present out there because there's almost no environmental damage or crime happening out there that is associated with motorized users. There is far more environmental damage caused by mining, cattle and equestrian uses; for example, survey the condition of a trail after 4-6 horses go through, and look at the same trail after 4-6 ATVs/dirtbikes go through and you will see who causes erosion on trails. Horses and Cattle are terrible hazards to land and water! Motorized users find it quite ironic, and maddening, that the FS, et.al. seem to support these uses, while at the same time asking motorized users to use less and less of the public land. Generally, we abide by the date restrictions on certain trails because we don't want to do damage to OUR trails. I/we rarely even see another person or vehicle, who is not a rancher moving their cattle, in the Helena National Forest either, and this is even on weekends. And that includes other motorized users...and deer, elk, bears, cougars, and hikers are very few and far in between as well..... The proposed roads and trails -including the 'user made' ones that we have now in the Divide Plan are not getting overused nor abused. There is very little use..-by ANYONE- .. It would truly be a poor investment	(5-1) Thank you for your comment.

Comments	Response to Comments
as well as inappropriate management- to put more time and money in limiting access that does not require limits. In fact, based on the points I raised, I would ask that even more motorized access was permitted: (5-1) -Trails that are through-routes, as opposed to dead-ends that need to be re-used in order to get back, need to be found and allowed for motorized users. One of those being the minor creek crossing at Mary Ann Creek. That is an important ATV connection route that basically connects Rimini to Elliston. (5-2a) -Another road I see is closed yearlong in the Alternative 1 (No Action), but needs to be open at least from June15-Oct15 is 227C, which connects Kading Road to the ridge above, without causing ATV traffic on the paved Kading rd (227). (5-2b) -Another system of interest is up Clark Canyon (4005- 05) (unauthorized roads)..Most of these are well established roads, not made by 'users' but instead made many years ago by road building equipment.. I would like to see these be open yearlong, as they are already well established and are not an environmentally risky type of terrain (no swamps or water crossings, etc.).(5-2c) - Due to the now very limited availability to motorized travel in the upper Little Blackfoot area, a through-type ATV route that goes from Kading Campground to Cliff Mountain and back around would spread out use and provide some access for motorized users. This does not appear to be an environmentally sensitive area, its well outside the Spotted Dog WMA, and the Forest is already allowing some motorized use in the Kading Grade. I understand this area is being considered for other uses and I would like to put a word in for motorized users to have authorized access to this area. It does get some ATV use now and has for decades. It would be nice to have an authorized route provided, to minimize rogue routes in a couple undefined areas. In addition, a THROUGH ROUTE back to Kading would be ideal to minimize wear on the trail system. Trail 329 (Blackfoot Meadows), would be ideal to complete a through-route for motorized users. "Multi-use" and even "one-way only" travel for 'Cliff Mountain Loop' motorists restrictions could be implemented , in the same way it works well in the L&C National Forest in the Little Belts. This is fair use for all, and I would ask that the Forest consider employing this more often	(5-2a) Minnehaha NFSR 527 connects Tenmile (Rimini) to Telegraph (Elliston). (5-2b) NFSR 227 crosses and/or dead ends at private property. MTR 501 and MTR 1870 provide a connection and access from the Little Blackfoot to the Spotted Dog area. (5-2c) Thank you for your comment. The Forest Service looked at the transportation system as a whole within the entire Divide Landscape to determine through public participation and analysis what roads were appropriate to be designated open or seasonally open to wheeled and over-snow motorized vehicle. In alternative 5 NFSR 4005, NFSR 4005-C1 and NFSR 4005-D1 all provide access to this area. (5-2d)Thank you for your comment. Please see alternative 5 which provide short and long loop opportunities in this area.

Comments	Response to Comments
in the HNF.(5-2d) -And finally, a short 'wish list' of roads and trails I would like to use if they were open(again): + 1811,off 136 Rd. + 136-007 + 708-A1--to connect Snowshoe Cr. Rd. to Ophir Cr. Rd. +708-G1(5-2e) Needless to say, I support Alternative 1(No Action), along with NEW ADDITIONS to the motorized trails in the Helena National Forest. I think we should make motorized travel in the HNF equally supported as equestrians, hikers and mountain bikers. Please consider my comments and keep HNF OPEN to motorized uses. Thank You, Pat Ryan, Helena, Avon MT	(5-2e) Thank you for your comment, The Forest Service recognizes the importance of providing motorized use opportunities; the range of alternatives described in the EIS are designed to strike a balance between providing a diverse range of recreation opportunities and resource needs and protection. Route 708-E1 and NFSR 708-I1 with Route 1852-C1 connect Snowshoe and Ophir. Route 1811 is open in alternative 5. Route 136-007 is on the Continental Divide and redundant to 136.
(6) March 31, 2014 Good morning, I am against any further restrictions in the Helena National forest or any other for that matter. I have lived in Montana all my 61 plus years and have been thru road closures before. Is it the ultimate goal of this agency to view our property from the highway? The land in your trust isn't logged, access is already limited and the liberal groups(that get grant monies from the feds sue, to stop every project)dictate the direction the Forest Service is headed. There are more elk now than their have been in the last 50 years in fact in a lot of areas the populations are so high they cause damage to the very forests you claim to protect. Road closures will increase pressure on other areas that remain open causing problems in those areas just like the last time road closures were implemented. I don't even know why you have comment periods your mind is already made up, this pretty much in a nut shell is why a vast majority of people in the USA do not trust the federal government. The land belongs to the public and we should have access to the land	(6-1) Thank you for your input.

Comments	Response to Comments
that belongs to us. thanks Mark Keller Helena	
(7) April 2, 2014 Leave MTR 501, 503, and 504 open for ATV loop opportunities in the Kading area of the Divide travel plan. (7-1) Mike Henery	(7-1) In alternative 5, MTR 501 and several other connecting routes for loop opportunities are available in the Spotted Dog, Little Blackfoot and Telegarph areas. Routes 503 and 504 are located in an inventoried Roadless and have resource as well as safety concerns.
(8) April 2, 2014 Close Rd# 256 between Hope Cr. and Dog Cr. Due to resource damage and trespass.(8-1) Bob Koch	(8-1) Thank you for your comment.
(9) April 3, 2014 To: Helena Natl Forest Service Subject: Divide Travel Plan I am a resident of Elliston Mt. I am very much against road or trail closure on the divide trail plan! I have lived in Montana all my life and believe that the huge amount of road closures, newly designated wilderness areas in recent years are pushed through by non-residents. You are also closing more areas in the Lincoln area! No consideration is ever seriously given for older or disabled residents. I can assure you that most everyone I know in this area do not trust your studies justifying closures. We have been lied to many times. Most locals do not express their feelings because we feel you are going to do what you want regardless. Sincerely, Alan W. Young	(9-1) Thank you for your comment.

Comments	Response to Comments
PO Box 194 Eliston MT 59728 3-31-2014	
(10) April 5, 2014 Helena National Forest ATTN: Divide Travel Plan 2880 Skyway Drive Helena, MT 59602 comments-northern-helena-helena@fs.fed.us Re: Sweeny Creek and Divide Travel Plan Comments for the project record Dear Sir/Madam, The CTVA Sweeny Creek Work Group has met and developed the following recommendations and proposals for the Sweeny Creek project area: I. Our club is willing to volunteer effort to improve and maintain the Sweeny Creek area and also collaborative efforts with other groups that wish to cooperate. (10-1) 2. Move parking lot up the road and combine with snowmobile parking. Add OHV route from parking lot to lead into riding area. Kiosk for both summer and winter travel plan.(10-2a) 3. 10 p.m. closure for Sweeny Creek area to eliminate night time partying and allow law enforcement to patrol the area and enforce. (10-2b) 4. Designated camping area on USFS near fence line on route off Baxendale Road in Section 23. (10-2c) 5. Retain existing and historic routes as identified on the attached CTVA Sweeny Creek Alternative map. (10-3) 6. Route closure and loss due to lack of maintenance by the Forest Service is not	(10-1) Thank you for your input, volunteer efforts are imperitive to all functional areas. (10-2a) Collocation of the parking lots was considered however several other resource issues remain in the Sweeny Creek area. (10-2b) Day use only is a management tool that can be considered, when other means to address resource damage and safety concerns occurring, aren't successful. (10-2c) There is no access across private connecting Sweeny Creek to Baxendale road. (10-3) The current road and trail system within the Divide Travel Plan area owes much of its existence to the early cultural history

Comments	Response to Comments
acceptable being that there is no travel plan in effect. Maintenance can and will be addressed using grants and volunteer efforts. 7. We would like to adopt as a project the reopening of the route by the cabin in the far eastern quadrant and the addition of an extension of the northwest route to connect to the Priest Pass road. These projects will be addressed using grants and volunteer effort. 8. We are open to relocating the most southern route that transverses the seasonal riparian area for more sustainable routes. (10-4) 9. We recommend researching and identifying all historical sites such as but not limited to; quarries, mines, homesteads, cabins, and timber operations to preserve access to these historic features. Very little of this type of sites have been preserved in the Helena National Forest. EPA work and time has removed many of them. The legacy of the pioneers, early settlers, and miners are being removed from the landscape. (10-5) We recommend that interpretative facilities be provided for future generations by construction a kiosk at parking lots and installing trail direction/mileage and destination signs. (10-6) 10. We are extremely concerned that the claimed benefits to the natural environmental are not all that real and come at a significant cost to the human environment which are very real. The CTVA Sweeny Creek Work Group recommends the following points be adequately incorporated in the Divide Travel Plan: 1. We encourage collaborative efforts that will produce use for historical, traditional, and environmental use for elderly, handicapped and disabled persons and veterans including persons with age related physical limitations. 2. We are motorized multiple-use recreationists that acquire/provide funding and provide volunteers to build and maintain motorized routes. 3. Routes that can be reasonably evaluated for closure are parallel, have unsafe and/or non removable obstacles, or those that are high maintenance and/or are erosion prone (10-7).	of this region. Upon its formation, the Forest Service simply preempted existing historic travel routes- parts of which had antecedents in American Indian trails. By this process, a variety of historic cultural resources (i.e. mines, homesteads, timber camps, trapper cabins, log flumes) to which these roads were intimately connected also came into federal ownership at the turn of the 20th Century. In addition the Helena Ranger District has a recreational and administrative travel system which includes trails and roads that are considered cultural resources and/or potentially eligible for listing in the National Register of Historic Places. The 1939 Helena National Forest Visitor Map is the map we currently use to determine the baseline age of trails and roads across the forest. The “existing and historic routes” on your attached CTVA Sweeny Creek Alternative map do not appear on the 1939, 1959 or 1969 Helena National Forest Visitor map; therefore we do not consider them historic routes or cultural resource (10-4)Thank you for your input. (10-5) The Helena National Forest currently manages 945 known cultural resources, of those, 238 cultural resources represents quarries, mines, homesteads, etc. The Helena National Forest also has 14 Historic Mining District that cover large landscape which include multiply associated features, such as building ruins, adits, shafts, ditches, roads, and trash piles. Of those 945 cultural resources, 7 sites are listing in the National Register of Historic Places (3 of them are on the Helena Ranger District), 839 sites have not received eligibility determination, therefor they are treated as Eligible. Forty-eight sites have been

Comments	Response to Comments
4. Route closure/loss due to lack of maintenance by the Forest Service is not acceptable in that there is no travel plan in effect. These can and will be addressed in grants and volunteer efforts. We have a strong track record with both. 5. OHV visitors carry shovels and chainsaws and will help to maintain the trails and keep them open from beetle-killed downfall. If motorized recreationists are removed, then the closed motorized routes will eventually be lost to everyone because motorized recreationists are the only one to carry and use chainsaws. We invest a lot of our time with the clearing of beetle killed trees. (10-8) 6. Motorized route closures due to sign damage/theft, garbage, damage to riparian areas is not an acceptable or justifiable cause. These can and will be addressed in grants and our volunteer efforts. Motorized users cannot justifiably be singled out as the sole culprits. 7. In all travel plans; routes should include turn outs for safe passage and vista turn outs for scenic viewing and rest areas. (10-9) 8. Collaborative efforts should be used to research, identify, and preserve history. 9. All aspects of prior history, mining, timber and traditional routes should be developed, studied and preserved for future generations for historic knowledge. These must be done prior to travel decisions or the selected alternative must use the map with our proposal because it accomplishes the same as the aforementioned. (10-10) 10. Route closures cause loss of all prior history use. The Continental Divide Trail is an interactive part of history that must be inclusive in all trail decisions to preserve, protect and to mitigate further loss. Visual or other loss by non-use due to route closure is not acceptable. (10-11) 11. OHVs are growing in popularity (see registration trends). Additional routes are needed to address future motorized growth. (10-12) We would be happy to further explain our proposal and to meet with you to work out details.	determined Eligible for listing, but have not been formally listed and 51 sites have been determine Not Eligible for listing in the National Register. A total of 181 cultural resources are identified within or adjacent to roads and trails in the Divide Travel Plan area. These cultural resources were discovered and documented as a result of prior cultural resource reconnaissance and project inventory in the travel plan area.. On-the-ground inventory of each road and trail affected by the proposed Divide Travel Plan has not been undertaken because the Forest Service is considering only whether a road or trail will remain open or closed in this land use decision. Specific road closure methods, and their effects, will be the subject of separate environmental analyses. NHPA Section 106 compliance survey will be completed then, as necessary, for roads and trails proposed for obliteration. The proposed motorized route closures would be beneficial to cultural resources by preventing easy vehicle access to sensitive cultural resources which helps to abate vandalism and artifact theft. For example, historic mining buildings accessible by motorized routes located in the planning area have been dismantled to obtain antique wood for various decorative uses such as in home remodeling and picture frames. Mining equipment, such as ore carts and old equipment parts, have found new homes as lawn and landscaping ornaments. Prehistoric and historic properties are a non-renewable resource. They represent a resource base that cannot be replenished. For this reason several federal laws and regulations have been established that require federal agencies to identify, monitor, protect, and preserve cultural resources

Comments	Response to Comments
Thank you for considering our input. Sincerely, Kenneth H. Salo for /s/ Action Committee on behalf of our 137 members and their families CTVA Sweeny Creek Work Group Members: Doug Abelin, Patty Daugaard Dana Petersen Cindy Mitchell/Petersen Tom Burns Mike Sedlock Shannon Partin Jody Loomis Don Gordon. Capital Trail Vehicle Association (CTVA)' P.O. Box 5295 Helena, MT 59604-5295 Email: CTVA Action@q.com Web Site: http://ctva-ohv.com/ Contacts: Doug Abelin at (406) 461-4818 dabelin@live.com Don Gordon at (406) 458-9577 DGordon315@aol.com Ken Salo at (406) 443-5559 ksalo245@msn.com George Wirt at (406) 227-6037 G_wirt@msn.com Attachments: CTVA Sweeney Creek Alternative Map 4 5 2014	under their jurisdictions. Through the final NHPA Section 106 process, all undertakings would be identified and addressed, and any necessary mitigation measures incorporated into the project design or other appropriate heritage resources agreement. The goal is to avoid, minimize, or mitigate impacts to significant cultural properties. Since the late 1970s, cultural resource inventories have preceded all ground-disturbing Forest Service projects on the Helena National Forest, including vegetation treatments, livestock grazing, restoration, and recreation development. The majority of the cultural resources described in this travel plan analysis were discovered as a result of these compliance inventories. In fact, many archaeological sites were found because they were exposed in old road and trail beds. In most cases, project boundaries and treatments would be reconfigured to avoid impacting significant cultural resources so they could be preserved and the effect of these actions on cultural resources would be relatively minor. All forest actions require NHPA compliance and consultation therefore the effects on cultural resources would be mitigated through project redesign and/or avoidance. Roads and trails have been constructed through archaeological and historic sites over a period of many years. Regardless of alternative, road use has the potential to degrade cultural resources, particularly prehistoric archaeological sites. Any federal actions that poses an adverse effect to cultural resources (for example EPA cleanup) is required to consult with

Comments	Response to Comments
Sweeny Creek existing routes in red small *(editorial note – the attached maps were too large to fit in this table. They are available to view at the HNF office)* _____ [1] *CTVA is also a member of Montana Trail Vehicle Riders Association (mtvra.com), Blue Ribbon Coalition (sharetrails.org), and New Mexico Off highway Vehicle Alliance (nmohva.org),. Individual memberships in the American Motorcycle Association (ama-cycle.org), Citizens for Balanced Use (citizensforbalanceduse.com), Families for Outdoor Recreation (ffor.org), Montana 4X4 Association, Inc. (m4x4a.org), Montana Multiple Use Association (montanamua.org), Snowmobile Alliance of Western States (snowmobile-alliance.org), Treasure State Alliance, and United Four Wheel Drive Association (ufwda.org)*	the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Office (SHPO) and the Tribal Historic Preservation Office (THPO) to mitigate those effects (36 CFR 800). A few examples of mitigations are public interpretation, data recovery, or site relocation. The Helena National Forest has in the past and will continue to manage the Montana legacy for future generation through scientific investigations, preservation, restoration, rehabilitation, adaptive reuse (historic rental cabins), public interpretation and overall cultural resource management. (10-6)Kiosks and other education and interpretation options will be considered during implementation of the Divide Travel Plan. (10-7) Alternative 5 focuses on closing parallel roads. (10-8) Thank you for your input, volunteer efforts are imperitive to all functional areas. (10-9) Attempts were made within Alternative 5 for locate trails and roads that would access vista points and tournouts. (10-10) The Helena National Forest currently manages 945 known cultural resources, of those, 238 cultural resources represents quarries, mines, homesteads, etc. The Helena National Forest also has 14 Historic Mining District that cover large landscape which include multiply associated features, such as building ruins, adits, shafts, ditches, roads, and trash piles. Of those 945 cultural resources, 7 sites are listing in the National

Comments	Response to Comments
	Register of Historic Places (3 of them are on the Helena Ranger District), 839 sites have not received eligibility determination, therefor they are treated as Eligible. Forty-eight sites have been determined Eligible for listing, but have not been formally listed and 51 sites have been determine Not Eligible for listing in the National Register. (10-11)A total of 181 cultural resources are identified within or adjacent to roads and trails in the Divide Travel Plan area. These cultural resources were discovered and documented as a result of prior cultural resource reconnaissance and project inventory in the travel plan area.. On-the-ground inventory of each road and trail affected by the proposed Divide Travel Plan has not been undertaken because the Forest Service is considering only whether a road or trail will remain open or closed in this land use decision. Specific road closure methods, and their effects, will be the subject of separate environmental analyses. NHPA Section 106 compliance survey will be completed then, as necessary, for roads and trails proposed for obliteration. The proposed motorized route closures would be beneficial to cultural resources by preventing easy vehicle access to sensitive cultural resources which helps to abate vandalism and artifact theft. For example, historic mining buildings accessible by motorized routes located in the planning area have been dismantled to obtain antique wood for various decorative uses such as in home remodeling and picture frames. Mining equipment, such as ore carts and old equipment parts, have found new homes as lawn and landscaping ornaments. Prehistoric and historic properties are a non-renewable

Comments	Response to Comments
	resource. They represent a resource base that cannot be replenished. For this reason several federal laws and regulations have been established that require federal agencies to identify, monitor, protect, and preserve cultural resources under their jurisdictions. Through the final NHPA Section 106 process, all undertakings would be identified and addressed, and any necessary mitigation measures incorporated into the project design or other appropriate heritage resources agreement. The goal is to avoid, minimize, or mitigate impacts to significant cultural properties. Since the late 1970s, cultural resource inventories have preceded all ground-disturbing Forest Service projects on the Helena National Forest, including vegetation treatments, livestock grazing, restoration, and recreation development. The majority of the cultural resources described in this travel plan analysis were discovered as a result of these compliance inventories. In fact, many archaeological sites were found because they were exposed in old road and trail beds. In most cases, project boundaries and treatments would be reconfigured to avoid impacting significant cultural resources so they could be preserved and the effect of these actions on cultural resources would be relatively minor. All forest actions require NHPA compliance and consultation therefore the effects on cultural resources would be mitigated through project redesign and/or avoidance. Roads and trails have been constructed through archaeological and historic sites over a period of many years. Regardless of alternative, road use has the potential to degrade cultural resources, particularly

Comments	Response to Comments
	prehistoric archaeological sites. Any federal actions that poses an adverse effect to cultural resources (for example EPA cleanup) is required to consult with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Office (SHPO) and the Tribal Historic Preservation Office (THPO) to mitigate those effects (36 CFR 800). A few examples of mitigations are public interpretation, data recovery, or site relocation. The Helena National Forest has in the past and will continue to manage the Montana legacy for future generation through scientific investigations, preservation, restoration, rehabilitation, adaptive reuse (historic rental cabins), public interpretation and overall cultural resource management. (10-12) Thank you for your input
(11) April 7, 2014 To: Helena District Ranger My whole life I have loved the outdoors and it's my passion to hike, climb, hunt and fish every chance I get. With private land being locked up at an alarming rate I would ask why is our public land being locked up at an equally alarming rate? We already have millions and millions of wilderness and road less areas more than anyone can see in a life time so why do we need more! Now that I'm getting older I'm beginning to feel decimated against because I don't have the physical ability or finical means to ride horse back to enjoy these areas where roads are being closed! So I would ask: Why does every new travel plan result in more and road closures? (11-1) Please stop making it more difficult to enjoy our public land!	(11-1) Thank you for your comment, The Forest Service recognizes the importance of providing motorized use opportunities; the range of alternatives described in the EIS are designed to strike a balance between providing a diverse range of recreation opportunities and resource needs and protection.

Comments	Response to Comments
James Allen Box 1147 Fort Benton, MT	
(12) April 7, 2014 Introduction to Comments for DEIS and Programmatic Amendment for Divide Travel Plan 3/23/14 Although if there was a process to vote for an alternative, I would vote for Alternative 1. Since Alternative 2 is the USFS proposed alternative, I will work with it to establish my comments. The proposed plan attempts to increase elk security and habitat by limiting motorized access and human activities. In the Summaries and Conclusions section, there exists a statement there are approximately 4300 more elk in the hunting districts since 1986 (pages 37 and 38). The elk, seem to be doing fine in numbers with current conditions even though they do not strictly adhere to a USDA, USFS, and MFWP promulgated standard. It is possible that elk herds larger than those present will result in increased conflicts with adjacent private land owners in future years. Another concern is elk die offs caused by lack of food or weather conditions which are not allowed for in a perceived standard. My reasons for keeping roads open to travel by highway vehicles are the following: 1. Access to HNF is needed for a growing aging population who cannot afford specialized vehicles to access their national forest. This includes elderly and persons with disabilities. (12-1) 2. Fire suppression. Although agencies like USFS state that certain roads and trails are closed to motorized vehicles but left open for fire suppression, this is a de facto closing of the road. Motorized recreationalists carry axes and saws to clear dead fall from roads and trails they wish to utilize. USFS does not have the funds to accomplish this task in a comprehensive manner. (12-2)	(12-1) Thank you for your comment. The Forest Service looked at the transportation system as a whole within the entire Divide Landscape to determine through public participation and analysis what roads were appropriate to be designated open or seasonally open to wheeled and over-snow motorized vehicle. (12-2) The travel plan alternatives show various combinations of routes to remain open for public motorized use and access to the National Forest. Routes closed to the public, yet determined to be necessary for future resource management

Comments	Response to Comments
3. Fire wood gathering is becoming more important as energy costs rise. Those who gather fire wood perform an important service by cleaning the dead wood out of the forest and forming fire breaks and lower the possibility of huge forest fires. Access to areas of the forest where pine beetles and spruce bud worms have decimated the forest creating a fire hazard have also created sources of fire wood. These areas are not always conveniently located next to USFS travel designated roads and trails. (12-3)	will remain on the landscape. For emergency situations, open and closed routes, as well as off route travel can be authorized. (12-3) A range of alternatives are being considered in the EIS to address off-route travel for parking.
4. The value of retaining more than one certain road or trail that accesses the same point on the map is that conditions may prevent access or egress to an area for a short period of time and one must use an alternate trail or road. (12-4)	(12-4) We recognize the need for access to public lands for people with disabilities and strive in our proposed alternatives to provide ample recreational opportunities for all while balancing the needs for resource protection. In all alternatives, motorized opportunities are provided and within these, motorized routes aimed at varying abilities and skill levels are provided. Adherence to national and regional guidelines prohibits us from allowing some individuals access to areas generally closed to others.

Route ID	Preferred Route Designation	Additional Specific Reasons
1853-C3	03-RES	Preserve a loop; elderly/handicapped access without need for specialized vehicles
1853-A1	03-RES	For camping access
622-D1 622-G1	Yes; Open for yearlong motorized vehicles, including over snow motorized vehicles	elderly/handicapped access without need for specialized vehicles
1855-004 1855-C4 1855-C2 1855-B2 1855-B1 1805-B1 1805-D3 U-204	03-RES	Preserve a loop; elderly/handicapped access without need for specialized vehicles

Comments				Response to Comments
4044 4044-B1 4045-D2 4045-C1 4045 4045-A1 136-B5 136-B2 136-C1 136A1 1849-A1 1849	03-RES	Elk habitat preserved due to seasonal restrictions		
1852 1852-B1 1852-A1 1811	03-RES	Elderly/handicapped access without need for specialized vehicles		
4026 4026-B1	03-RES	Elderly/handicapped access without need for specialized vehicles		
708-H1 708-E1 708-F1 708-A1 708-G1	03_RES	Elderly/handicapped access without need for specialized vehicles		
227-B1	03_RES	Elderly/handicapped access without need for specialized vehicles		
335-A1 335-A2	03-RES	Elderly/handicapped access without need for specialized vehicles		
1802-B2	03_RES	Elderly/handicapped access without need for specialized vehicles		

Comments	Response to Comments
1856 | 03-RES | Elderly/handicapped access without need for specialized vehicles George Marble 3504 Pondera Rd. Helena, MT 59602	
(13) April 7, 2014 This letter is identical to the previous letter sent in by George Marble It was from: Karen Marble 494 Third St. Helena, MT 59640	(13-1) Thank you for your comment.
(14) April 8, 2014 Helena National Forest Service Attn: Divide Travel Plan I would like to know why you are considering closing more roads in the divide travel plan? I am against this as now that I am retired and not as physically able to enjoy the back country, I now use ATV travel. Closing more roads ends this opportunity for people like me. (14-1) I first started exploring this area back in the 70's and on my travels in that area last summer I have not seen much change. There is still an abundance of wildlife in the area so obviously ATV and or motorized travel has not taken from it and has not affected the habitat. There are not allot of places one can take an ATV any more. Closing more roads on our public lands takes away more from us then you realize. Who is the person who had this idea? Someone started the ball rolling on this	(14-1) Thank you for your comment. The Forest Service looked at the transportation system as a whole within the entire Divide Landscape to determine through public participation and analysis what roads were appropriate to be designated open or seasonally open to wheeled and over-snow motorized vehicle.

Comments	Response to Comments
project. Is it someone who moved here from California? This should be public information as this is pubic land. Why don't you publish the people's names and photo's who come up with these ideas and want to take from us. If you decide not to listen to the public and close these roads anyway, then you should lower our taxes as we won't be able to use our public lands. Mike Heimann 1 Jackson creek rd. PMB 2342 Montana City, Mt. 59634	
(15) April 9, 2014 I think restricting motorized travel in the divide area will not be beneficial to wildlife or to the public. Restricting access of the public to the public owned ground is wrong on many levels. The public owns the ground and most almost entirely cutting off access to that ground to make non ADA accessible is criminal at best. By reducing the number of routes into an area will concentrate the traffic and drive wildlife away from those heavily used area, and into areas they are not as well suited to thrive. Also concentrating them and making easier prey to predators. (15-1) Jamie Mongoven 406-439-4502 5763 Palomino CT Helena, MT 59601	(15-1) We recognize the need for access to public lands for people with disabilities and strive in our proposed alternatives to provide ample recreational opportunities for all while balancing the needs for resource protection. In all alternatives, motorized opportunities are provided and within these, motorized routes aimed at varying abilities and skill levels are provided. Adherence to national and regional guidelines prohibits us from allowing some individuals access to areas generally closed to others. Please see the wildlife specialist report and references cited in the DEIS and FEIS for more information on effects of motorized travel on wildlife.
(16) April 10, 2014 I am responding to the proposed road closures including Priest Pass. My family has	(16-1) We recognize the need for access to public lands for

Comments	Response to Comments
used that area for riding ATVs and target practicing for over 27 years. We have seen more and more areas closed over the years, and this is one of the only areas left that is close to Helena. I recently bought a little ATV so that I can start teaching my grandchildren to ride, and they will be taught to stay on trails and not leave trash the same as my sons were. This area is used by many riders, and to loose access would be a great blow to us all. Another big reason for concern is that my wife is disabled and unable to walk any significant distance. She loves target shooting, and this is where she shoots. (16-1) The great majority of the people that use this area are responsible and trash is rarely an issue. When it is, the trash usually doesn't stay long, since we regularly pick it up. There is a large number of ATV riders, and we are working, taxpaying citizens. We far outnumber the hikers in that area, and the number of horse riders is negligible. Please consider the usually silent majority instead of the very vocal minority. Sincerely, Fred Irby 406-202-0105	people with disabilities and strive in our proposed alternatives to provide ample recreational opportunities for all while balancing the needs for resource protection. In all alternatives, motorized opportunities are provided and within these, motorized routes aimed at varying abilities and skill levels are provided. Adherence to national and regional guidelines prohibits us from allowing some individuals access to areas generally closed to others.
(17) April 11, 2014 You are here to serve the interests of the general public and not the interests of a well funded few. We the people of Montana do not agree with your proposed agenda. Do not close more roads. Open more of the roads you have closed. Closures hurt us. Rachel and Ryan Abelin	(17-1) Thank you for your input.
(18) April 15, 2014	

Comments	Response to Comments
United States Department of Agriculture Mr. William Avey, Forest Supervisor 2880 Skyway Drive Helena, MT 59602 RE: USFG Helena National Forest Divide Travel Plan Draft Environmental Impact Statement Dear Mr. Avey: Thank you for the information and request for comments regarding the Draft EIS on the Divide Travel Plan project. Please find the below referenced comments: •On page 148 of the Divide DEIS, USFS acknowledges that the current road management system does have an impact on stream and riparian health. However USFS seems to assert that the decision to open or close a road to public use will not have any significant effect on stream and riparian health. Please provide the scientific basis for this assertion. (18-1) •Page 146 contains the following statement: "In streams with no previously identified water-quality impairment, this report will assume that beneficial uses are being fully met" (18-2) Unless a stream is listed in the current, Montana Water Quality Integrated Report as being in Water Quality Category 1, it has not been determined to be supporting all beneficial uses. The most current Montana Water Quality Integrated Report can be downloaded from the Clean Water Act Information Center website at http://deg.mt.gov/wginfo/CWAIC/default.mcpx. •The Little Blackfoot TMDL document was completed in December of2011. Please update references in the Divide DEIS to reflect the completion of the Little	(18-1) The *Hydrology, Affected Environment* section has been expanded for the Final EIS to include more rationale, with references to multiple peer-reviewed publications, behind the assumption that the open/closed designation would not result in a substantial change to the existing impact of roads on streams and riparian areas. In short, this decision would not result in measureable changes in the impact to water quality from roads because “a road closed by this decision may generate less, the same, or more sediment over time as a result of the closure, depending on the road surface condition, the topography of the road and surrounding terrain, the effectiveness of the closure, and other factors. Similarly, a road opened by this decision may or may not become a greater source of sediment, depending on level of use, maintenance, improvements, and other factors”. (18-2)The referred to statement has been removed from the *Assumptions* section of the Hydrology Specialist Report. (18-3) The *Affected Environment* section of the Hydrology Specialist Report has been updated to include the Little

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Blackfoot TMDL document (e.g. page 148, et al). (18-3) If you have any questions or would like to discuss this information further, please contact Mark Ockey in the Water Quality Planning Bureau at (406) 444-5351 or by email at MOckey@mt.gov. Sincerely, Bonnie Lovelace Regulatory Affairs Manager Director's Office (406)444-1760	Blackfoot TMDL report published in 2011.
(19) April 15, 2014 Sirs, I live on Priest Pass Road, out of Helena. I have USFS property on three sides of my property. All I can tell you is that this area is one of the most poorly managed and abused pieces of public ground I have ever seen. I've lived up here for 30 years and watched while the bureaucratic bungling and delays have resulted in a once-pristine area becoming a complete travesty of off-road abuses, wildlife habitat destruction, pervasive prevalence of noxious weeds and utter desecration. The lower Sweeney Creek area has been overrun by 4-wheelers, motorcycles and off-road vehicles of every sort. There are countless "new roads" everywhere, and it is dangerous, not to mention unsavory, to even consider walking or riding a horse in the area. It should have been closed to motorized traffic a decade ago. To say that the USFS has been remiss in managing this part of the public domain, is the understatement of the year. It is nothing less than criminal to see what has happened. I understand multiple-use public ground. This is simply unrestrained and chronic abuse. In short, it has NOT been managed for the public legacy, and largely ignored. A proper travel plan has been languishing for a decade, while an easy solution has been ignored. It's pathetic, deplorable and disgusting. Roads are everywhere, lunatic off-roaders terrorize the place, knapweed runs rampant and it's a complete mess. Fix it!! Keep the irresponsible abusers OUT of the area - CLOSE it to motor vehicles!!	(19-1) Thank you for your input.

Comments	Response to Comments
Carl Wambach 7700 Priest Pass Rd. Helena, MT 59601	
(20) April 22, 2014 William Avey, Forest Supervisor Helena National Forest 2880 Skyway Drive Helena, MT 59602 Dear Mr. Avey: The U.S. Department of the Interior has reviewed the Draft Environmental Impact Statement for the Divide Travel Plan, Helena national Forest, MT and has no comments on the document. Sincerely, Robert F. Stewart Regional Environmental Officer	(20-1) Thank you for your input.
(21) April 23, 2014 Terry L. Beaver 1023 Highland Helena, MT 59601 beaverpt@bresnan.net Hard Luck Mine & Bison Mtn. Trail #4104-A1 T8N-R6W sec. 19, 20, 28, 29, 21 This copy of the 1977 Helena N.F. ½" planimetric map shows the configuration of access prior to the road construction and subsequent harvest of the Bison Mtn. Sale. The map establishes "Acclaimed Function" and utilized access with roads from Hard Luck to Ontario and from Bison Creek to Monarch Mine. The Hard Luck	(21-1) There are differing perspectives among motorized users

Comments	Response to Comments
access to Ontario crosses a slump that would be difficult to keep open and would constitute an unwarranted safety hazard. The Bison cr. to Monarch could be re-instituted by using the proposed alternative route of road-trail #4104-A1. This is a good choice.(21-1) (editorial note – a map pertaining to the previous comments was attached – it was not included in this table, but is available for viewing at the HNF office) _____ Mike Reinig Drainage Road #1856 T9N-R6W sec 34, 35, 26, 23, 14 The existing condition map, Alternative #1, shows Mike Reinig as closed to motorized, wheeled vehicles year long. This has been the condition for approximately 20 years, with the exception of two families who were given exclusive rights of use and occupation beyond every other individual. Even Forest Service work parties were required to park outside of the F.S. gate and walk to work sites along the road traveled by the unique elite. It is understood that access to private property is required, but when done so, that should not grant exclusive rights to those land owners. Every member of the public should have been treated equally. The opening of Mike Reinig road #1856 will finally recognize the rights of the populace to be commensurate with the rights of specified individuals. Road 1856 should be opened to motorized, wheeled vehicles from its origin at the locked "moose ponds" gate to its terminal point at the locked Forest Boundary gate on the West side of sec. 14 of T9N-R6W. (21-2) It is the correct thing to do. _____ Spotted Dog Road #314 T8N-R7W sec 6-7-17-8-16-9 This road extention was constructed in the Spotted Dog Timber sale as the main haul road from Spotted Dog creek to cutting units near the Ridge Trail. In Alternative #1, the extant condition shows it correctly as being open to wheeled, motorized traffic and is used as such. This road is proposed closed on Alternative 3, and conversly proposed open on Alternatives 2 and 4.	on which of these routes provide the best opportunity. If route 123-001 is designated open instead of route 4104-A1, it is recognized that the segment of trail crossing the slump you mention will need to be rebuilt. It is also recognized that crossings will need to be improved on either route if designated open for wheeled motorized use. (21-2) The area accessed by this road in upper flume, Little Flume, and Mike Renig Gulch is important year-round habitat for a number of key wildlife species. The gate closure, while compromised to an extent by the presence of local landowners, minimizes motorized activity in the area—which is the goal of management in this key area.

Comments	Response to Comments
This route constitutes a diverse recreational opportunity and a vital Forest utilization access for the management of resources to the Helena N.F. in this segment of the District remote to its personnel. The inclusion of this route to continued motorized, wheeled traffic would be an asset to Forest recreationists in the Kading campground area to take advantage of an opportunity to cross into the Spotted Dog drainage with an extended loop. The connectivity of road 314 on the South and the "Tree Farmer" road along with the "Avon Bridge" road on the North is highly advantageous to the Helena N.F. and to its users. Please keep it open to wheeled, motorized use as it now exists. (21-3a)	(21-3a)FS Road 314 will remain open to motorized use <50" wide, also connecting rt. MTR 501 will also remain open to allow for connectivity from Kading area to Elliston through FS rd. 314..
_____ Recommendation for final publishing of Helena N.F. Travel Plan map & all subsequent publications of all National Forest Maps The great majority of Forest users and Forest visitors are navigating through G.P.S. Many of them have difficulty in determing their location on the ground as referenced by the Forest plarimetric maps. To simplify their use and make it easier to comply with the Forest Travel Plans, I would like to recommend that tick marks be added to the external margins of all Forest maps. Presently tick marks are shown for each 7 1/2 minute interval, probably to match the 7 ½ minute quad maps.(21-3b) I would appear to me that 1 minute intervals would be an easy addition and would facilitate use by intersecting vertical & horizontal map axes, corresponding to latitude and longitude lines and their interpolations. This should result in fewer lost Forest workers, users and visitors. Thank you for your consideration.	(21-3b) Thank you for your input.
_____ Clark's Canyon Logging System Road #4005-005 T10N-R7W sec 1 Road #4005-005 is a logging complex all of which is in excellent condition. The road prisms show virtually no wear and all are passable with 2 wheel drive. This system affords an alternative to 4005 which becomes highly washed in the N ½ of sec. 1 where it passes through private land. It is an excellent recreational opportunity from Dog Creek to Clark's Canyon and the N. Ellison area. Please do include it in the open to wheeled motorized status in the decision. It is	(21-3c) Thank you for your input. As you point out, the range of alternatives consider designating 4005-A1 open and closed.

Comments	Response to Comments
shown on Alternative 1 as unauthorized but yet has system road designation. It is recommended to be opened in Alternatives 2, 3, and 4. I concur. (21-3c) _____ In the DEIS page 6 – you have stated that you intend to close creek and/or river crossings at existing Fords until they can be replaced by bridges, bottomless arches or culverts. There were three locations stated and will be addressed here individually. Larabee – the existing condition definately requires that this route remain closed until extensive mitigation occurs. Little Blackfoot River - ford to access the "Evening Star", "Golden Anchor" and "Negro Mtn." areas. This is a ford that has been of such structure for 125 years. It has handled year of heavy mining traffic from the 1800's until the present. It has been the primary access route for all utilization functions for many, many decades. To close it for any period of time until contractual arrangements, funding and construction can be accomplished, is not necessary nor prudent. It is highly advisable to keep the solid bottom, rolled rock ford open throughout all of the process. The Bison Creek ford on road 4104-A2 will become the access point for roads 4104-A2 and 4104-A1 which is a proposed interconnection between the Telegraph and Little Blackfoot drainages. (21-4a) There is an existing ford of Bison Creek at the East end of this road 4104-A2.This ford has a heavy gravel bottom and a heavy gravel approach to the stream. It has experienced recreational camping and hunting traffic of 4x4 pick up and ATV and snow mobile traffic prior to the harvest of Bison Mtn. It had been a resident cabin site at the time of the activity of the "Hard Luck" mine. Recreationists and hunter camps have continued to use it to access camp sites just across the ford for many years. Again to close this ford while awaiting preparation time, contracting, funding and construction is not necessary nor prudent. It is highly recommended that this fully functional ford remain open throughout the process. Please do not hold up the function of the road awaiting construction that is not necessary to become fully functional. (21-4d)	When private property is concerned, a single route crossing the private property is generally sought to reduce redundancy and public travel on private property. Route 4005 appears to be the primary route used to access this area. (21-4a)Ford stream crossings can increase sediment delivery to stream channels because they provide a direct link between the road surface and the stream. These impacts are discussed in greater detail in the Affected Environment section of the Hydrology Specialist Report and in the Fisheries Specialist Report. (21-4d)Please also see the fisheries report in the EIS for further discussion on these crossings and why they are to be closed until they can be upgraded.

Comments	Response to Comments
_____ Bison to Monarch Roads #4104-A1 and 4104-A2 T.7N-R6W sec. 19-20-28 At present this route is closed to wheeled, motorized vehicles. On Alternatives 2 and 4 it is recommended to open it to such traffic. The recommendation to open said routes is an excellent addition to the travel plan. It would afford an extremely viable interconnection between the Telegraph and Little Blackfoot drainages. These routes along with the remainder of the Bison Mtn. Timber Sale have been locked off for elk security purposes. The regeneration and subsequent growth of naturally regenerated Lodge-pole and Douglas fir now constitute excellent hiding cover. The road prisms are in great condition and are fully stable. (21-5) The inclusion of these two road segments may also eliminate the need felt by some to create non-authorized routes from the Telegraph to the Little Blackfoot drainages. The creek crossing at Bison Creek at the origin of road 4104-A2 is one that has been defined as delaying the opening of this route for an undetermined length of time until a bridge, bottomless arch or culvert can be installed. (The Helena Ranger District anticipates 2 to 3 years to complete this). The existing crossing at Bison Creek has been a simple hard bottom Ford, that has been fully functional for time reverting back to mining operations likely 80 years ago. Campers and hunters have used the area immediately distal to the creek crossing for many, many years. Please do not delay the route opening, contingent upon a modernization of the creek crossing.	(21-5)This proposed route and its potential impact on the local wildlife resource, as well as the trade-offs you note here, are discussed in some detail in thewildlife section of the EIS [“Local Effects in Key Areas”] and in the Wildlife Background Report [“Local Effects in Key Areas: Upper Ontario Creek – Bison Creek” (p. 258-262) and “Upper Telegraph Creek” (p. 254-258)]. The Effects on elk and other big game species relate partly to security during the hunting season but also to habitat effectiveness in summer.
_____ East Fork of Sally Ann, road #527-B1, T8N-R6W sec. 1, 2, 11 Alternative #1 of the existing condition shows this road along the E. fork of Sally Ann creek as being open to wheeled motorized traffic. Our group has in the past traveled this route and has ceased to do so because of the potential damage to the riparian zone along that road. Creek crossings are damaging to the banks and any	(21-6a)Alternative 5 closes rt. #527-B1 to all motorized use.

Comments	Response to Comments
attempt to go around them compromises the riparian areas adjacent to the road. We feel that it would be prudent to close the route rather than trying to mitigate the problem areas. There are other routes that can use the mitigation efforts and funds toward more success. (21-6a) _____ Spotted dog haul road, 314-J3; T8N-R7W sec. 6-7-18-19 Road 314-J3 There is a discrepancy as to the status of this road. This road was part of the Spotted Dog Timber Sale. It is shown as an open route on Alternative #1 being open to wheeled motorized vehicles 6-1 to 8-31. A major geological slump occurred in the proximal 1/3 of this route immediately following the harvest of the units accessed by this road. It was never re-opened and has been closed for the past 30 years. It is not passable. It should be shown as closed and should not be considered for re-opening. (21-6b)	(21-6b) Thank you for your input. This road is listed as closed to wheeled motorized vehicles yearlong in the exsisting condition.
_____ Spotted Dog, Road 314-J1; T8N-R7W sec. 6-7-18 Road 314-J1 has been open to motorized vehicles 6-1 to 8-31. We travel this road annually and enjoy its diversity of second growth timber, riparian draws and sub-alpine meadows. It terminates in a regenerating sub-alpine fir meadow habitat. There is abandoned mining work ½ mile beyond the terminus. The road serves as range allotment salt-licks for cattle. The cattle seem to dominate the elk for grasses during the summer but after the cattle move down, the elk move in for Fall range. It should therefor continue to be closed for hunting season. Please leave road 314-J1 open to motorized wheeled 6-1 to 8-31.(21-7a)	(21-7a)FS rd. 314-J1 will remain closed to motorized travel yearlong to help facilitate wildlife security in this area
_____ Treasure Mtn. T9N-R6W sec 31-30-32; T8N-6W sec 6. 1857-A1 Road 1857-A1 within the Treasure Mtn. sale has been locked up since the completion of that sale. Natural and planted regeneration has been certified and are now saplings. The road prism is generally rough rubble rock which will hold its structure very well. This road segment is proposed to be opened to motorized wheeled traffic on Alternatives 2-3 & 4. This would provide excellent access to the Negro Mtn. area – Golden Anchor mine	(21-7b) Thank you for your input.

Comments	Response to Comments
and the Evening Star. It affords excellent recreational potential for ATV and two wheel access. Please do open this route to wheeled, motorized vehicles. (21-7b) _____ Julia Mine – Glacier Pot Hole road. 1859-E1 T8N-R6W sec. 22-15-16 and 1859-D4 sec. 16-17-8 and 1857-D1 sec. 8 This road system connects with road 1857 from the North and connects with road 495 at its South end. 1857-D4 affords access to the Julia Mine area. 1859-D4 provides access to a series of geological pot holes that 50 years ago were small lakes. Through normal succession these have filled in with soil and grasses constituting the extant condition. Road 1859-E1 constitutes the connectivity to road 495 at the South end of this road system. This entire route has been open to use off and on for the past 25 years. Two F.S. gates have been swung open during this entire time. A third gate at "Julia Ann" in sec. 9 of T8N-R7W interconnecting with 1857-D1 has been swung open for the past 3 years. Prior to that it was locked intermittently. On the existing road condition of (Alternative #1), this composite of roads was designated as closed to motorized vehicles year long. This has not been the condition on the ground. Alternatives 3 & 4 show this entire road system as existing condition -no change. Does this reflect "closure orders"- does it reflect a mistake on Alternative #1 – or does it reflect what is on the ground? Alternative #2 shows opening this road system to wheeled motorized vehicles. This road system should be open to access historic mining properties and for people to experience the biological succession so rapidly occurring among the geological glacier pot holes endigenous to this route. It is heartily recommended that this road system remains open and accessable by motorized for those of us who are not physically capable of walking into such unique areas.	(21-8) For Alternatives 3 & 4 the road is listed as closed to wheeled motorized vehicles yearlong. Alternative 5 proposes to seasonally open this to road to vehicles less than 50".

Comments	Response to Comments
It is a road system in excellent condition, with cut and fill in good repair throughout. No damage is foreseen as the road prism and surface are hard shale. Thank you very much for retaining this for wheeled, motorized use. (21-8) _____ Telegraph Ridge (Lindquist cabin) T8N-R6W sec. 22 Road 1859-E1 There is a discrepancy in the origin of road 1859-E1 as it intersects with road 495. The patented private mining claim at the N. most extremity of sec. 22 had a road as is delineated on the existing condition (alternative #1) as road 1859-E1. Approximately 15 years ago, the owner of the patented property built a cabin in the center of the road. This was legal by the land owner (Lindquist) and approved by the Helena N.F. An alternative connector to 1859-E1 was constructed and signed approximately 100 yards to the N. of the route shown on Alternative #1 of the existing condition. Therefore road 1859-E1 no longer passes through this private property to connect with road 495. The new connection of 1859-E1 is shown on the diagrammatic sketch on the previous page.(21-9) (editorial note – a map pertaining to the previous comments was attached – it was not included in this table, but is available for viewing at the HNF office) _____ Spring Gulch Road 1852-A1 T11N-R6W sec 7 & 8 T11N-R7W sec. 13 Road 1852-A1 parallels Spring Gulch drainage from its e origin at the now extinct Spring Gulch Ranger Station and terminates 2 ¼ mi. S.W. at “Uncle Ben”. It has been proposed to be closed to all motorized traffic on Alternatives 2, 3 & 4. This is an ecologically sound decision and I fully support your rationale in doing so. The Meadows sit atop dense top soil but remain saturated for 90% of the year. The soils are fragile in that the grasses are not capable of withstanding abrasion by wheeled or tracked vehicles. It should be closed. _____ Esmerelda Hill Road 4005-A1 and road 708-G1 T11N – R7W sec 23	(21-9)Thank you for your comment, this will be reviewed. (21-10) Thank you for your input. (21-11)The Divide Travel Plan encompasses the Austin, Ophir, Rimini, Elliston and Helena Historic Mining Districts. These mining districts have numerous “historic routes” associated with them. However, it is very difficult to conduct a historic assessment without a baseline date/age. For this reason we generally reference historic Forest maps, Government Land

Comments	Response to Comments
There exists a discrepancy on the existing condition (Alternative #1) map which shows road 708 G-1 as closed to the Snowshoe road. This is not the case. 708 G-1 should be shown as closed from the gate on the N. end of its terminus 2 ¼ mi. S. and road 708 G-1 should end at its N. most point at a locked gate. Road 4005-A1 which originates 4 ½ miles South at Clark's Canyon should be shown as paralleling 708-G1 and by passing the gate on its own separate road bed and continuing on to the Snowshoe road. These are completely separate roads. Road 708-G1 is a logging system road and has been closed as part of the Ophir/Cave sale ever since the completion of that harvest. (21-10) Road 4005-A1 is part of historic mining and range access out of Clark's Canyon and its connectivity to Esmerelda Hill and Snowshoe.(21-11) The existing condition of the road on the ground is that it is presently open, while on Alternative #1 it is shown as closed. (21-12) Thank you for your consideration in showing the opening of road 4005-A1 to its most Northerly terminus at the Snowshoe road. (editorial note – a map pertaining to the previous comments was attached – it was not included in this table, but is available for viewing at the HNF office) _____	Office plats, Homestead Entry Survey plats, Historic photographs, publications documenting local histories and historic overviews. It is very likely that several routes proposed for closure in the Divide Travel Plan area are associated with historic mining. However, closing these routes without obliterating them from the landscape is not considered an adverse effect to a cultural resource. (21-12) Thank you for your input.
Right Hand Fork of Jerusha T07N-R08W sec 5 NOT TO BE MISCONSTUED WITH JERUSHA RD #1811 Not to be confused with the Jerusha Timber sale Road #1811, which is gated & locked at it's south entrance on the Marysville/Ophir Divide road. The existing condition map, (Alternative #1) of the Divide Travel Plan has omitted an existing road which has existed since 1880, when it was used as an ore freighting road from the "American Flag" mine to the "Shakopee" mine and mill, on Towsley gulch. This road preceded the existence of the Helena National Forest by 25 years. (21-13) It remains today as a unimproved "road" fit for ATV and/or snowmobile traffic. It is well defined on the ground with some stretches still exhibiting the original cut and fill. The "road" crosses the drainage bottom twice, which at times may be wet,	(21-13) See response 21-11. (21-13)Helena National Forest does not have legal right of way for connecting the public from private land mining claims to the mentioned route.

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but not running any water. The entire "road" is approximately ¾ mile long and parallels a drainage known as the "Right Hand Fork of Jerusha". It interconnects two private pieces of mining claim properties and interconnects with the Lost Horse road immediately East of the O'Connel Cabin. It is an interesting access for our ATV group between the Ophir/Marysville route and Lost Horse/Empire creeks. It passes through a stand of well sheltered old age D.F. There are no fishery concerns and wildlife appears to be losing any competition to domestic cattle. Please consider recognizing this very short segment as a route of Historic significance and as a recreational route we have used for many years. Please keep this route open to motorized wheeled ATV traffic.(21-14) (editorial note – a map pertaining to the previous comments was attached – it was not included in this table, but is available for viewing at the HNF office) _____ Colorado Gulch Egress road. Described as Trail #314 on the 1977 Helena N.F. map (delineated as a trail, but it was actually a road). T9N – R5W sec 24 (see attached map) T9N – R4W sec 19, 29 There is an old road initiating at the distal end of Colorado Gulch and terminating on the North Fork of Travis gulch, near the Brooklyn Bridge Divide, that should be re-opened. Colorado Gulch with its numerous residences presently constitutes a disaster waiting to happen. When we experience a wildfire in the mouth of Colorado Gulch combined with the prevailing N.W. wind, we will have great potential of losing life. The problem is that Colorado Gulch is a "dead end" road with numerous homes within it. The sensible and proactive alleviation would be to re-open the road from the Feather-pipe ranch to McKelvey's place on the N. Fork of Travis. This would provide an alternative exit for the population of Colorado Gulch and wildland fire fighters, when that inevitable fire occurs. The road could be reconstituted for emergency exit only with knockdown fences	(21-14) The route you speak of that connects the American Mine and Shakopee mind does not show up on any historic maps we have access to for review. Without a historic map showing this route we do not have a base line date to make an accurate historical assessment. If you have a historic map that shows this route, we would be happy to asses its historic value. However, FSM 2364.35 states one of the administrative measures to protect cultural resources from human-caused and environmental damage is "Closure to public and motor vehicle access". Cultural resources (included historic routes) could be directly affected by permanent use and maintenance. The closure of historic routes or routes that lead to sensitive cultural resources is considered a protection and preservation measure. (21-15) Motorized use for emergencies is authorized outside of the travel plan.

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constructed on both ends. Signs at both ends should limit access to “Emergency Egress Only” and should not be used for any other purpose. If this road or another road out of Colorado Gulch is not made available for egress, it should be mandated that wild-land wild fire suppression crews will not be allowed to fight fire in that drainage. (21-15) (editorial note – a map pertaining to the previous comments was attached – it was not included in this table, but is available for viewing at the HNF office)	
(22) April 24, 2014 Diane Tipton Pine Ridge LLC 1968 Rimini Rd Helena MT 59601 Called to comment on needing trail signs at the intersection of Bear Gulch Rd and trail #348. Due to lack of signing trail users get confused, end up at her property boundary and are forced to trespass on her private property to egress out to 10 mile road. Roadless area boundary on the maps show that the roadless designation goes onto her private property. This needs to be corrected. (22-1) Sweeny Creek has been abused for years by unmanaged recreation and illegal motorized abuse. This is critical wildlife habitat and needs to be protected.	(22-1) Non-motorized trail junction was signed as a result of the phone call. (outside of Scope) Roadless area boundary is a mapping error that will be corrected in the decision map.
(23) April 26, 2014 Hello Helena National Forest, Attached are comments representing me and my family on the Divide Travel Plan Draft Environmental Impact Statement. Thank you for this opportunity to comment and participate in the process of managing the public lands that shape and nurture our lives. <<...>> Gayle Joslin	

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Helena Hunters & Anglers Association 219 Vawter Street Helena, MT 59601 406-449-2795 joznpoz@bresnan.net 2014 DIVIDE DEIS ON TRAVEL PLANNING Helena National Forest April 26, 2014 ATTN: Divide Travel Plan 2880 Skyway Drive Helena, MT 59602 Divide Travel Plan 2014 Throughout these comments I use the plural "we" to refer to myself and my extended family who have had input and editorial license throughout this commentary. First of all, we wish to state on the public record, that few things matter to us more than the conscientious stewardship of our public land natural resources – here at the doorstep of our home along the flanks of the Continental Divide. Few agencies have more history or meaning to us than the U.S. Forest Service with its colorful and courageous genesis out of the corporate exploitive era of the late 1890s and early 1900s. The Helena National Forest was in fact, one of Theodore Roosevelt's "Midnight Forests" – public lands that he and his staff valiantly worked to define as National Forests, and to preserve wild places "for those yet unborn in the womb of time." We are those unborn souls he was referring to, and we do not believe we have the right to drop the ball or retreat from the responsibility to be involved in the future of our public lands. For that reason, I very much appreciate the opportunity to comment on actions that affect the National Forest public lands, and in this case, the Divide Travel Plan.	

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Previous comments that I have submitted on various iterations of a proposed Divide Travel Plan go back 15 years and include those in 1999, 2003, 2005, 2009, and again now. Concerns about natural resource degradation over these past 15 years have only become more acute. I appreciate your determination to bring this process to a responsible conclusion – one that will help restore this landscape. The following issues are described in this correspondence: Wildlife Big Game Security Standard/Amendment Roadless Water quality Divide Travel Plan Questions & Individual Road Recommendations Alternatives Cumulative Effects Monitoring, Enforcement and Schedule Recommendations References Specific comments on individual roads/routes presented in the 2014 Divide Travel Plan and how they might be improved for the benefit of wildlife and other natural resources, are provided for your consideration and action. Wildlife Linkage The Divide Travel Planning area constitutes one of the most important linkage zones in the Northern Region. It connects the Northern Continental Divide, Yellowstone, and Salmon- Selway ecosystems, yet it is one of the most roaded, fragmented, and thus fragile areas of national forest land in Montana. The Divide Landscape of the Helena National Forest constitutes the central linkage connection between all areas of western and central Montana as described by American Wildlands (2008) and Montana Fish, Wildlife & Parks analysis of	

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wolverine movements (2008 Furbearer Regulations). The Divide Landscape is the center or "Hub" of wildlife linkage within the state of Montana. Its ability to continue to function in this capacity is critical for low-density, far ranging carnivore species such as grizzly bears, wolverine, mountain lions, wolves, lynx, as well as wide-ranging ungulate species (elk, moose, bighorn sheep). Bighorn sheep have been seen at the headwaters of Minnehaha Creek, along the Continental Divide in the Divide Landscape even though this is not bighorn habitat. Another marked bighorn from the Sleeping Giant area was located near Elliston, attesting to the linkage importance of the Divide landscape. And yet the Divide Landscape is a relatively battered place in need of careful, restorative management. Maps of seasonal elk distribution over a portion of the Divide Landscape are attached (Divide Elk maps 27-34) and demonstrate the importance of the Helena Forest lands and distribution following the Continental Divide. Maps from 2008 showing wolverine and lynx distribution for the MacDonald Pass area are available but additional information for a broader area from the Helena National Forest who has contracted Wildthings Unlimited to gather low-density mid- sized carnivore information. They report: "Our cameras obtained photos of several different wolverines, and added valuable data related to year-round use of an area of atypical wolverine habitat including: relatively low elevation, roaded, and with human uses such as logging, hunting, and snowmobiling. We believe this is extremely important to wolverine conservation in Montana. Last winter's efforts resulted in documentation of more previously unknown lynx and wolverines in the Helena N.F. study area, which is exciting and valuable news." In addition, the Wildlife Conservation Society has defined a crucial area connecting the three major wolverine ecosystems as the Central Linkage Ecosystem that includes the Divide Landscape (Inman et al., 2008). Grizzly bear occurrences throughout the Divide Landscape attest to the area's importance as a linkage zone if not yearlong habitat in areas such as Nevada Mountain, Hahn-Hat Creek near Elliston, and Little Blackfoot.	

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Travel planning actions taken to improve landscape linkages, in the form of limiting duplicative motorized road and trail use in the Divide area would be an important, positive step. Alternative 3 clearly does the best job of that, still could be improved.	
Effects of Recreation on Wildlife National Forest management decisions are required to be based upon "the best available science." In borrowing from the Montana Chapter of The Wildlife Society's January 14, 2009 comment on the Divide Travel plan, it should be noted that the Montana Chapter of The Wildlife Society undertook a comprehensive effort to address the Effects of Recreation on Rocky Mountain Wildlife – A Review for Montana1. That document, and its associated on-line bibliography, was partially funded by the USFS. Copies of the report were provided to every national forest and most ranger districts in the State of Montana. The Effects of Recreation report was compiled by 35 wildlife biologists from state, federal, university and private settings from across Montana, who volunteered their time specifically to provide this information to land and wildlife managers.	(23-1)Non-motorized trail junction was signed as a result of the phone call. (outside of Scope) Roadless area boundary is a mapping error that will be corrected in the decision map.
The Divide Draft EIS cites the Montana Chapter of The Wildlife Society document in the References section, however, the material provided in the document does not appear to be utilized or referenced in the DEIS, either in the various Wildlife chapters or the Recreation chapter. (23-1). Valuable scientific information was provided for all wildlife species groups including amphibians and reptiles, small mammals, birds, ungulates, carnivores, and semi-aquatic mammals. In addition, discussion about impacts from recreational uses to soils, water, and vegetation was presented. Several Chapter members have been responsible for collecting information for this specific area over the years. Within the chapter on Ungulates, the following with respect to big game security is noted: "Managers of public lands control only a few of the potential variables that contribute to security including retention of important vegetative cover, travel management, and enforcement of travel regulations. There is a strong relationship between adequate security and predicted buck/bull carryover"2	(23-2a,b) The Forest Plan amendment and the wildlife analysis describe cover and travel management for all alternatives. These analyses assume that all regulations are being followed (See Big Game Amendment and wildlife analyses in Chapter 3). Information used for the Forest Plan amendment and the wildlife analyses are based on best science and direct knowledge of species use in the project area (See Big Game Amendment, Section Alternative Description/Alternative B/Discussion and the wildlife analyses in Chapter 3). None of the Travel Plan alternatives achieve full compliance

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Three key issues are mentioned: vegetative cover, travel management, and enforcement of travel regulations. Since the final selected alternative will determine the effectiveness of the proposed big game security forest plan amendment, these subjects must be fully addressed within the FEIS and reflected in the selected Alternative. (23-2a) Previously, MCTWS noted, and the comments are still relevant for the Draft EIS: Conversion of previously closed routes to open routes for motorized use has not been analyzed or justified with respect to initial closure rationale and whether the purposes for initial closure have changed. Established analysis procedure requires that the USFS use the best scientific and commercial information available and ensure that any final decision is based on the most recent, up-to-date information on wildlife use of the area. The proposed action must be in compliance with the Helena National Forest Plan. At present, the proposed action does not appear to be in compliance with standards for soils, watersheds, elk (security, summer and winter range standards), or the Northern Rockies Lynx Management Direction. (23-2b) User-created roads (whether they are called roads or trails) must be closed and reclaimed, and should not be included in the transportation system. These "user created routes were developed without agency authorization, environmental analysis, or public involvement and do not have the same status as National Forest System roads and trails included in the forest transportation system." 70 Fed. Reg. 68268. In other words, these illicit routes were illegally created, never authorized by the USFS, and have never undergone any form of NEPA analysis. As such, these user created routes must be immediately closed, repaired, and excluded from the USFS's transportation network. The USFS cannot and should not legitimize such routes or reward OHV users for their illegal and destructive behavior by now designating such routes as part of the new transportation system. The USFS must initiate and complete formal consultation on lynx pursuant to	with Forestwide Big Game Standard 4a (See Big Game Amendment, Section Relationship of Forest Plan Standard 4a and Elk Management and the wildlife analysis for elk in Chapter 3). The Forest took the opportunity during travel planning to update The travel plan is consistent with all other wildlife standards (See Forest Plan consistency section).Standard 4a to be spatially explicit. Multiple Resource Specialist Responses: (23-3a) Consultation is currently underway on the Travel Plan. The extent of the effects will determine whether consultation is formal or informal. (23-3b) The Forest Plan Consistency Table in the Final EIS addresses the proposed action's compliance with Forest Plan Standards. The Forest Plan Consistency section of the Hydrology Report

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section 7 of the Endangered Species Act.(23-3a) The USFS must ensure compliance with the Travel Management Rule and all relevant Executive Orders – including Ex. Order 11644 (as amended by Ex. Order 11989). At present, the proposed action is not in compliance with Ex. Order 11644's duty to locate areas and trails to minimize damage to soils, watersheds, and vegetation, minimize harassment to wildlife, or minimize conflicts with users. (23-3b) Big Game Security Standard/Amendment The existing big game security standard was based on published literature derived from 15 years of research on the specific topic of road density, placement, and timing of use in Montana (Lyon, et al. 1985). The document, Coordinating Elk and Timber Management3, was conducted over 4 study areas and concluded: Road density and pattern, including off-road travel, play an important role in determining the security level an area provides to elk during the hunting season. An area with sparse cover and low road densities may provide as much security as the same size area with heavy cover and high road densities.(8) Conversely, it is also true that areas with heavy cover and high road densities may provide as much security as the same size area with sparse cover and low road densities. However the proposed big game security standard would eliminate all reference or requirement for cover. With respect to security and the need for cover, Lyon et al. (1985) stress: Road density and cover quality are both important when considering adequate elk security during the hunting season. (8) Central Montana elk require the greater security provided by good cover at the edge of the opening. (10) The proposed big game security amendment was not derived from field research,	specifies compliance with Forest Plan direction on water quality for the action alternatives, "The proposed travel plan, under any of the action alternatives, does not specify any activities that would directly result in the degradation of water quality in the planning area. In this sense, the travel plan is in compliance with the Forest Plan standard requiring that a project resulting in water pollution be modified or discontinued. The plan is also consistent with the Forest Plan standard requiring that BMPs are employed in projects to minimize non-point-source pollution, in that routes designated as system routes would be required to be maintained at appropriate standards, and unauthorized routes would be available to be removed from the landscape. While the Decision would not directly specify road improvements or decommissioning, its route designations set the stage for this work." (23-4)The Forest Plan amendment is based on the best available information. The purpose and need for this amendment is articulated in the amendment section as follows: In the twenty nine years since the development of the Forest Plan, a substantial amount of scientific studies, surveys, and other information have been accrued. These studies have suggested other measures that are also appropriate for measuring

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nor is it based on full application of scientific literature on the subject of elk vulnerability. None of the literature presumes that during the hunting season no vegetative cover is required. In circumstances where little cover is naturally available, such as the Missouri River Breaks, topography must substitute for vegetative cover; however, the hunting season must be severely restricted through permit only hunting to compensate for the lack of security. (23-4) The proposed big game security amendment merely draws polygons on the landscape and declares that these areas will be big game security. No longer would all National Forest lands be potential elk security. Big game security would be relegated to polygons. And the requirements for non-cover vegetation that Lyon et al recommended have not been described and listed as caveats for these polygons. Those requirements as described by Lyon et al. include: • Clearcuts: Openings should be small, even though openings up to 100 acres may be acceptable where the adjacent forest edge supplies adequate security; • Provide undisturbed security areas adjacent to the area of activity • Concentrate management activity into the shortest possible time (includes follow-up activity such as planting and burning) (39) • Confine disturbance to the smallest area possible within a single drainage (39) It must be noted that the knowledge of elk security with respect to vegetative cover and roads described in "Coordinating Elk and Timber Management" (1985) was signed and adopted unilaterally in 1984 by the Bureau of Land Management (Edwin Zaidlicz, State Director), Northern Region U.S. Forest Service (Tom Costain, Regional Forester), School of Forestry, University of Montana (Benjamin B. Stout, Dean), Montana Department of Fish, Wildlife and Parks (James W. Flynn, Director), and the U.S. forest Service, Intermountain Forest and Ranger Experiment Station (Laurence El. Lassen, Director). On what grounds and based on which literature is the Lyon et al. (1985) time-tested approach to elk security being tossed out and replaced with the proposed big game	big game security, and are more closely tied to open motorized route densities during times of elk stress and increased vulnerability (i.e. hunting season). In addition, the elk harvest metrics used by the Montana Department of Fish, Wildlife and Parks (MFWP) to evaluate and manage elk vulnerability during the hunting season (the reason for providing security) have evolved, leaving part of the standard as currently written useless because it relies on data methods no longer available or in practice. As a result, public access is being constrained without the clear benefits for elk envisioned by the standard. This programmatic Forest Plan amendment for the Divide Travel Plan project area is needed to more closely align current science, local conditions, and other information with the needs of big game, particularly elk, which meet the intent of the Forest Plan. The amendment considers the impacts of open motorized routes on elk security, establishes blocks of secure habitat, and can be measured regardless of changes in hiding cover. While the proposed amendment decouples hiding cover from security during the hunting season, several Forest-wide and Management Area standards remain in place that govern management of hiding cover. The assumptions built into the existing (1986) Forestwide Standard 4a (hereafter Standard 4a) have not proven useful in gauging or guiding management activities under the Forest Plan. Actual elk populations and trends as monitored over the last twenty nine years simply do not correlate with this existing standard or its assumptions. Elk numbers have consistently increased during this time period and the existing standard needs to be revised to address recent elk management challenges.

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security amendment? (23-4). I would posit that there is none and that the current proposal to change the standard for big game security has been designed at a conference table over the past couple years, with no field research or testing. The very plausible reason for this approach is that the Helena National Forest has failed, over the past 28 years, to apply and adhere to the existing security standard, and instead has determined repeatedly for landscape altering projects that there would be "No Significant Impact". As a result, the HNF has finally arrived at the day of reckoning, and in fact they cannot comply with their own standard now, because they have failed to do so over the past 28 years (23-4). For example the "Decision Notice and Finding of No Significant Impact" for the Forestwide Hazardous Tree Removal and Fuels Reduction Project, signed August 23, 2010 by Supervisor Riordan is just one of hundreds of projects that have been similarly issued over the past 28 years. The Decision stated: "An alternative that was considered but eliminated from detailed study was one that addressed the road density issue raised from the public. These comments came during the Objection period. Some comments suggested the Responsible Official consider an alternative that would reduce open road densities as a means to increasing elk security. With this proposal not being a travel management decision, this proposed alternative is outside the scope of the decision space and analysis." (Hazard Tree Project DN, August 2010) Yet the Decision that was made to "treat" many roads in remote settings, influenced the subsequent travel plan, the functionality of the big game security and habitat effectiveness standards, but failed to address those impacts. (23-4) [attached: HAZARDOUS TREE PROJECT SUMMARY OF ROADS TO BE TREATED Helena Hunters and Anglers Association, September 24, 2010) The analysis conducted for the Hazardous Tree Project clearly reveals that all the Elk Herd Units that were meeting Forest Plan Standard 4a for big game security	In response to public comment, the Forest includes a cover guideline as part of Alternative B. While the new Forest Plan Programmatic Amendment does not require that elk security areas provide a particular level of hiding cover, it does recognize forest cover as an important component of security and includes a set of guidelines for managing cover. The guidelines focus on maintaining cover to the extent practicable where it exists within security areas and in travel lanes between them. Where cover is not available, the guidelines emphasize managing for its recruitment. (23-4)The 'Coordinating Elk and Timber Management' (Lyon et al. 1985) remains a part of the Helena National Forest Plan. Standard 6 (Forest Plan, p. II/19) states the following: Montana Cooperative Elk-Logging Study Recommendations, in Appendix C, will be followed during timber sale and road construction projects. Appendix C includes all of the considerations in that study. The purpose and need for the amendment is stated above. Contrary to the public comment ("…cannot comply with their own standard now, because they have failed to do so over the past 28 years") three of the 6 elk herd units in the travel plan project area do meet Forest Plan Standard 4a. Regarding the Forestwide Hazardous Tree Removal and Fuel Reduction Project, effects to Big Game are described in that analysis and articulated in the current programmatic amendment under the Cumulative Effects section. Forest Plan Amendment Alternative B has refined the definition of elk security to reflect local conditions (See Forest Plan

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were in and near roadless areas, including Nevada Mountain, Jericho, Little Blackfoot, Bison Mountain. All these Inventories Roadless Areas (IRAs) occur on the Divide Landscape and stress the importance of IRAs to Elk Herd Unit security. The rationale for "clearing" old routes within these roadless areas was unjustified as indicated by the lack of compliance with the security standard and the fact that other areas that do not occur in/near roadless areas do not meet the security standard. This is not to say that areas not having roadless areas cannot meet the standard, the HNF simply has to limit road densities in these areas. (attach HAZARD TREE PROJECT ROADS BY ELK HERD UNIT: Roads Analysis of EHU to HNF/Hazardous Tree Removal/Issues/HHAA) DEIS Appx C pg 17 indicates that even for Alt 3, one herd unit would remain below the 30% threshold, but then goes on to say all 6 EHUs would meet the 30% standard. That in fact is not the case – one would NOT meet the standard. Measures should be taken to raise all EHUs above the minimum 30% security level. Elk have been used as a surrogate, or Management Indicator Species, for the needs of other ungulates (mule and white-tailed deer, moose), but for a variety of behavioral and nutritional reasons, elk do not reflect the needs of other ungulates. While elk herd numbers have often risen over the years because they are so mobile and move off of national forest lands when it becomes insecure, deer and moose do not. Currently in Montana, mule deer, white-tailed deer, and moose populations are at serious lows. These are species whose movements are much more limited than that of elk. This is not a time to be eliminating the forest cover component from the big game standards. It is time for restoration of the landscape. The landscape and wildlife will begin to heal if an aggressive travel plan is implemented so a return to the time-tested "best available science" of the existing big game security standard can be restored. Roadless	amendment, Alternative Description/Alternative B).

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Compliance with the Roadless Rule must be demonstrated. That compliance includes providing "lasting protection" for IRAs in the project area. These IRAs are characterized by high quality, undisturbed soil and water and a diversity of plant and animal communities. According to the USFS, these IRAs "provide clean drinking water and function as biological strongholds for populations of threatened and endangered species . . . [and] large, relatively undisturbed landscapes that are important to biological diversity and the long-term survival of many at risk species." 66 Fed. Reg. at 324.	(23-5) Bison Mt area will remain closed to over snow vehicles
These IRAs also "provide opportunities for dispersed outdoor recreation, opportunities that diminish as open space and natural settings are developed elsewhere. They also serve as bulwarks against the spread of non-native invasive plant species and provide reference areas for study and research." Id. By law, these biological strongholds are to be managed for "lasting protection." In adopting a proposed action the USFS: (1) must comply with the Roadless Rule and manage these areas for lasting protection; and (2) should prohibit and/or restrict all motorized access in the IRAs.	(23-6) 495-D1 was analyzed but not treated in the hazard tree removal project, the road does provide for recreation access to Ontario Creek (23-7)495-D1 was analyzed but not treated in the hazard tree removal project
Jericho Mountain is an Inventoried Roadless Area (IRA). Return it to roadless status. The Divide Landscape is extremely fragmented with private in-holdings in Banner, Monitor, Minnehaha, and Telegraph Creeks. Roads that have been created in Roadless areas should be removed to improve the landscape integrity.	
The Bison Mountain Inventoried Roadless is known to have denning grizzly bears and wolverine. Yet, over snow vehicles can use road 1801 which traverses the Bison Mountain Area (Electric Peak Roadless Area) in Alternative 3 and 4, but is currently closed to snowmobiles in Alternative 1. Maintain the existing condition of no over snow motorized vehicles – Keep 1801 closed. (23-5) Within meters of the Bison Mountain IRA road 495-D1 was sanctioned for "treatment". This road connects to the CDNST that has restrictions of 50" or less, yet 495-D1 is open to highway vehicles yearlong even though it does not connect to any road that is currently open to motorized vehicles.(23-6)	

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Road 495-D1 is a clear example of a road that was included in the Hazardous Tree Removal Project, deep in the National Forest next to an IRA, but didn't provide a hazard to anyone. (23-7) Yet road 495-D1 has been or will be "treated" by removing trees along its length, grading and possibly gravelling. This was an action that was not necessary and was pre-decisional to the Divide Travel Planning process. Other roads not occurring within the Wildland Urban Interface that have been slated for Hazardous Tree Removal treatment prior to the Divide Travel Planning process and thus were also pre-decisional and cumulatively impacted big game security, leading the HNF to declare that they could not meet the standard for security. This recurring situation has led to the Catch-22 situation wherein the FS has chosen not to meet the big game security standard, so then they devised a new standard that would not limit either timber removal or motorized travel. But the fact is, they cumulatively ignored their own valid, scientifically based standard for nearly 3 decades. The Nevada Mountain Inventoried Roadless Area supports both denning grizzly bears and wolverine. While doing aerial wildlife surveys as a wildlife biologist for Montana Fish, Wildlife & Parks, I personally observed wolverine tracks and excavation holes on Nevada Mountain. In Alts 2 and 4, road 4044-E1 goes deep into the Nevada Mountain Inventoried Roadless Area. This route dead-ends after crossing through an area restricted to over snow motorized vehicles and penetrates about 1.5 miles into the IRA. (23-8a) None of the action alternatives adequately address massive road duplication to the south of the Nevada Mountain IRA. (23-8b). These roads inhibit linkage between the Nevada Mountain Roadless Area along the Continental Divide to and south of Highway 12, thus hindering movement of wildlife between ecosystems. A list of roads that were stamped for Hazardous Tree Removal in 2010, prior to this 2014 Divide travel plan, but which failed to meet the standards for "hazard" under the Wildland Urban Interface, are included in attachment: Roads Analysis 3rd – Divide Landscape (Hazardous Tree Removal/Issues/HHAA). Those 13 roads (22.59 miles) that were sanctioned for Hazard Tree Removal in Roadless Area include:	(23-8a)FS 4044-E1 will be closed in the preferred alternative (23-8b) Please see alternative 5 in the FEIS.

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1863, 607, 293, 293-A1, 296, 296-B1, 4196, 1892, 485-D1, 601-F1, 601-K2, 601-K3, 601-K4. Another 18 roads (36.44 miles) were slated for "treatment" next to Roadless areas during the Hazardous Tree project, even though the trees were not a hazard to anyone (607-H1, 123, 495- D1, 1834, 1834-C1, 1834-D1, 296-A1, 296-A2, 296-A3, 1830, 1831, 329-E1, 1838-E2, 1838-F1, 4135, 601-D1, 601-E1, 601-J1). This was simply an expeditious move on the part of the HNF to improve roads for future projects without having to go through the travel planning process. The Helena Hunters & Anglers objected to this approach, but their objection was denied by the Regional Office of the Forest Service. In addition, the Hazard Tree Removal project concluded that the big game security standard could not be achieved during that project, so the Forest Supervisor simply exempted the Helena National Forest from adherence to Forest Plan standard 3 (summer hiding cover) and 4a (big game security): "As part of my Decision I am amending the Forest Plan through a site-specific Forest Plan amendment for this project. Analysis for this project indicated the need for a site- specific Forest Plan amendment to the Helena Forest Plan regarding elk summer and winter range and big game security… As part of my Decision I am also making a site- specific amendment to the Forest Plan. This amendment exempts this project from the Forest Plan big game standards 3 and 4a." There was no actual amendment to Forest Plan wildlife standards 3 and 4a -- the amendment was simply an exemption from compliance with the Helena Forest Plan by the Helena Forest Supervisor. (23-9) Water Quality Please fully address Helena National Forest water quality conditions and where and how sedimentation would be curtailed and TMDL standards met under each of the 4 alternatives. Please explain what action would be necessary to fully rectify human-caused sedimentation and water pollution problems across the Divide Travel Plan landscape.(23-10a)	(23-9)A site-specific exemption is actually an amendment. There are two types of amendments: site-specific and programmatic. The effects of site-specific project amendments are limited in time and space; programmatic amendments provide direction that would be applied to future management activities (See Forest Plan amendment, Cumulative Effects section). (23-10a) The Affected Environment section of the Hydrology Specialist report discusses water quality conditions in Helena National Forest streams based on available data, and summarizes water quality issues that are associated with forest roads as discussed in the Lake Helena and Little Blackfoot TMDL reports. This decision does not determine future road decommissioning activities. The decision for future road decommissioning and related potential sedimentation reductions would be subject to future NEPA analysis and decision. Eliminating all human-caused sedimentation would require relocating all roads/trails to upland locations and hardening all stream crossings, which would not be not economically feasible nor would that meet the needs of all resources represented by the Forest Service. This travel plan provides an avenue for future decommissioning of closed routes and would allow maintenance efforts to be concentrated on open routes with resource issues. These steps would aid the Forest Service in moving towards meeting TMDL standards for reducing sedimentation from unpaved roads.

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Of the 23 stream segments sampled for % fines in gravels (Table 3.31), all but one (N. Fk Ophir Cr) exceeded reference levels – in some cases by 100%. The alternative having the least amount of motorized routes would help reduce sediments, and along with restoration activities, would be the most cost effective approach to improving the water quality. The Forest Service maintains jurisdiction on about 58.6 miles of high risk roads (pg. 213). Under action Alternative 3, about 27.98 miles of high risk FS roads would remain open and 30.66 miles (17.32 miles currently closed plus 13.34 proposed miles) or 52% would be closed to wheeled motorized vehicle use. Private and county roads account for balance of high risk roads or about 19.8 miles; these non-FS roads represent an ongoing cumulative effect to the surface water system in the planning area. With approximately 378 stream-road intersections (crossings) in the planning area, the Forest Service has jurisdiction on 288 crossings. About 142 FS crossings (49%) would be closed under this alternative. Additionally, nine FS dispersed campsites associated with high risk roads are directly adjacent TES fish habitat, and six of these would close under this alternative. The other three dispersed recreation campsites would remain open to public users and continue to adversely affect TES fish habitat without mitigations. Six currently open fords on TES fish streams would experience permanent or temporary closures to reduce risk of direct mortality to WCT and bull trout. A seventh closed ford located in Ontario Creek would remain closed to wheeled motorized traffic.	(23-10b) Please see alternative 5 in the FEIS.
Pg. 218 Currently there are approximately 58.6 miles of high risk roads and 288 crossings under FS jurisdiction throughout the planning area. Under the No Action Alternative, 17.3 miles (30%) of HRR and 94 (33%) of crossings are currently closed to wheeled motorized vehicle travel. Alternative 3 is the most beneficial	(23-10c) Please see Hydro report.

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alternative with respect to water quality with the least number of stream crossings open (but still 146 open crossings), and the least miles of sediment producing roads with 28 miles open and 30.6 closed. This translates into 8 fewer crossings and 1.6 miles more of closed high risk roads. Although the best of the offered alternatives, it seems there could be a much more beneficial alternative e offered to further reduce the extreme human caused sedimentation that still would come from 146 open stream crossings and 28 miles of open road even in Alternative 3. So, even in the best alternative, this still amounts to 50.7% of the damaging stream crossings, and 47.8% of the high risk roads being open to motorized travel. Please provide a more beneficial alternative for water quality. (23-10b).	(23-11) Please see the glossary section of the DEIS.
The 2006 Montana Department of Environmental Quality 303(d) List of impaired and threatened waters in need of water quality restoration cites several streams on the Helena national Forest. Have TMDL water quality restoration plans been developed for impaired streams? Examples include: (Editorial note – the examples provided by Ms. Joslin were in a table format that would not fit within this table. To see the examples, please contact the HNF)	(23-11b) Closure methods will be analyzed and decided on during implementation of this decision. Decommissioning will be one of the tools used to close routes not needed for future resource management.
Divide Travel Plan Questions and Individual Road Recommendations What constitutes an over snow vehicle and is there a minimum amount of snow that must be on the ground to travel on it?(23-11) See comments regarding 227-B1 and all other roads that have been "Closed to motorized vehicles yearlong, including over snow motorized vehicles" (gold lines over roads in Alternative 1).	
Adequate signage and physical barriers are essential to prevent illegal use of roads designated for closure. Decommissioning must be considered in certain cases. Such actions must be part of this proposal, but is currently is not.	(23-12)Thank you for your input.
The Divide Travel Plan public notice in the March 18, 2014 Independent Record, states: "The DEIS would include only open or closed determinations; decommissioning would not be specified in this decision." (23-11a)	
We wonder why this limitation is being imposed on the Divide Travel Planning area	

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when it was not imposed on the Blackfoot Travel Planning area in either the Draft or Final EIS, when arguably the Divide area needs more attention and restoration than the Blackfoot. We request that decommissioning be allowed as a tool in Divide Travel Plan implementation. (23-11a) Road decommissioning and removal must be available tools to address landscape recovery. The Divide Landscape does not compare to many other less impacted, less damaged areas of the Northern Region that have not been as affected by mining, logging, roading, damaging motorized use, and thus requires more attention in bringing it back to a more healthy, naturally functioning status. A failing landscape is one that is experiencing severe water quality issues, diminished fisheries and wildlife services in terms of habitat quantity and quality, movement, population structure. The Divide Landscape is verging on such a place. However, responsible, assertive stewardship can go a long way to recovering this portion of the HNF on the edge of the capitol city, along the Continental Divide, and linking the Yellowstone and Northern Continental Divide Ecosystems. (23-12) As tattered as the Divide is, the Helena City Commission recognized its value when it passed Resolution 2008-57 entitled, Resolution to Protect and Promote Conservation of Wildlife Habitat and Corridors along the Continental Divide (attached). The 2006 HNF Travel Map, signed by supervisor Kevin Riordan on May 1, does not show many roads that appear on Alternative 1. Opening such roads for motorized use is not responsible management in a landscape that has severe water quality and wildlife security issues. (23-13a) Clancy-Unionville Area - Interface with Clancy-Unionville Travel Plan The Clancy-Unionville Vegetation Manipulation and Travel Management Project Record of Decision was signed in February 2003 by Helena National Forest Supervisor, Thomas Clifford. That decision specifically does provide for motorized routes from the CU area to the Divide. Opening the Chessman 4009 road would	(23-13a)there is no intention of opening all the roads in alternative 1 (23-13b) Thank you for your input.

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violate the CU ROD. (23-13b) Chessman: 4009-A1 and 4009-B2 – Keep closed to motorized vehicles year long, including over snow vehicles. This area is used by moose yearlong and is spring elk calving area. It crosses into the Clancy-Unionville Travel Area and is closed yearlong to all motorized vehicles via the Record of Decision issued in 2003. All action Divide Alternatives open this route. This is not acceptable to the Clancy-Unionville Citizen's Task Force (K. Lloyd, President, pers. com.). (23-13b) The Clancy-Unionville Citizen's Task Force worked in concert with the Helena Ranger district during the entire Clancy-Unionville Travel Planning process, even going so far as to develop a citizen's travel plan alternative for the EIS. Red Mountain: Close 299-G1 and parallel road to 299-A1; 299-I1 and all roads associated with the Chessman flume project Banner Creek: Close 1876-A1 from NW ¼ Sec 16 (8N, 5W) to SE ¼ of Sec 16. Private land accessed from 1876-B1 – open ¼ section to access private land in SE ¼ Sec 16. This will reduce road mileage but still serve private land needs. Jericho Mountain This is an Inventoried Roadless Area. Return it to roadless status. Divide is extremely fragmented with private in-holdings in Banner Monitor Minnehaha, and Telegraph Creeks. Roads that have been created in Roadless areas should be removed to improve the landscape integrity. (23-14) Close the following: Unnumbered road in center of Sec 23 T9N,R6W, that is open to over snow vehicles, 12/2-10/14 in Alts 1 and 2 (closed in 3 and 4) In Inventoried Roadless Area: 1863, 1863-E1, 527-B1 To private land with no public access 1856-B1 Closure would add substantial big game security 1856-D1 It is unclear what this number refers to on the map 1856-J1 What decision process allow road 527-C1 to be constructed into the Jericho Mountain IRA? This route up Moose Creek does not appear on the 2006 travel map.	(23-14) Unnumbered road in center of Sec 23 T9N,R6W closed in preferred alternative 1863 will be closed after intersect with 1863-E1, closed in preferred alternative. 527-B1 closed in preferred alternative. 527-C1 closed in preferred alternative. 1856-B1 closed in preferred alternative, 1856-D1 closed in preferred alternative. 527-C1 closed in preferred alternative (23-15) Please see alternative 5. Thank you for your input.

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Now the route is open to over snow vehicles. This is elk, moose, and deer winter range. (23-15) Bison-Negro Mountain Bison Mountain Inventoried Roadless Area occurs within this area. Maintain Existing Conditions, which is "Closed yearlong to all motorized use": 1801, 1801-A2, 1801-A3, 1801-A1 1801 is allowed to traverse the Bison Roadless Area in Alternative 3 and 4, but is currently closed to snowmobiles in Alternative 1. Maintain the existing condition of no over snow motorized vehicles. Denning grizzly bears and wolverine are known to be in this area. Maintain Existing Condition: "Closed to all but snowmobile use": 1104-A2. All action Alts would open this to wheeled motorized use – do not change existing condition. Close: 495-D1 This road connects to the CDNST that has restrictions of 50" or less, yet 495-D1 is open to highway vehicles yearlong even though it does not connect to any road that is currently open to motorized vehicles At least Alternative 3 should offer closure of this road which would substantially enhance wildlife security. (23-16) • Road 495-D1 is a clear example of a road that was included in the Hazardous Tree Removal Project, deep in the National Forest next to an IRA, but didn't provide a hazard to anyone. Yet road 495-D1 has been or will be "treated" by removing trees along its length, grading and possibly gravelling. This was an action that was not necessary and was pre-decisional to the Divide Travel Planning process. Other roads not occurring within the Wildland Urban Interface that have been slated for Hazardous Tree Removal treatment prior to the Divide Travel Planning process and thus were also pre-decisional and cumulative impacted big game security. A list of roads that were stamped for hazardous tree removal prior to a travel plan decisions, but which failed to meet the standards for "hazard" under the Wildland Urban Interface are included in attachment: Roads Analysis 3rd – Divide Landscape (Hazardous Tree Removal/Issues/HHAA)	(23-16)495-D1 was analyzed but not treated in the hazard tree removal project, the road does provide for recreation access to Ontario Creek, Reference to CDNST of 50" or less is incorrect (23-17) Thank you for your input. The ranges of alternatives described in the EIS are designed to strike a balance between providing a diverse range of recreation opportunities and resource needs and protection.

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• Close 495-D1. • 227-B1 listed as Charter Oak is listed on the Existing Condition (Alt 1) map as "Closed to motorized vehicles yearlong, including over snow motorized vehicles" So it was pre-decisional and in violation of the existing travel plan, when in 2010 this road was sanctioned for "treatment" through the Hazardous Tree Removal Project. Now all Action alternatives in the Divide Travel Plan would "open this road to over-snow vehicles 12/2-5/15. Keep 227-B1 closed – if it has been open to now, this has been a clear and known violation of the travel plan. Telegraph A short dead-end. Close 1863-B1 • These private parcels have access already via 1859 so close: 527-A1, 527-A2, 495-C2. • Treasure Mtn: A plethora of roads show as open for highway vehicles in the existing Alt 1, however they do not show at all on the 2006 signed Travel Plan. This is not legal. • These roads did not exist on the 2006 travel map so close now: 1857-B3, 1857-008 • Road 1857 parallels the main Little Blackfoot Road less than ½ mile to the east for more than 3 miles. This duplication should be avoided. • Illegal OHV use of a pioneered trail around Slate Lake would continue in the absence of effective enforcement. If this use were eliminated, the Slate Lake area would serve as a non-motorized focal area for wildlife year-round. (23-17) Limburger Springs • The Limburger Springs area is in Winter Range. The following should be closed in all Alternatives (1, 2, 3, 4) to over snow vehicles: 314, 314-J1, 314-J3. • Only Alt 1 retains an over snow vehicle closure on winter range during the hunting season. This closure should be retained in all alternatives. • Close this route in the calving area: MTR 501, 503 • All of these are dead-end roads in winter range so close: 314-G1, G2, H1, I1, I2, J5 • These routes are dead end spurs and should be closed: 314-D1, F1, K2 (23-	(23-18) In the preferred alternative there is a motorized loop opportunity provided with seasonal restriction to address the wildlife concerns. All other dead end routs are proposed closed. (23-19) Sweeney Creek area will be closed in preferred alternative

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18) Sweeney Creek-MacDonald Pass • "Alternative 1 maintains existing condition. A 12 mile maze of motor trails produces a local open trail density of 2.9 mi/mi². There are no seasonal restrictions, and snowmobiles use the trails when snow is adequate. The NW end of the area and adjacent slopes provide prime winter range for big game animals. Motorized activity in this part of the area from mid fall through mid-spring is a serious disruptive influence." (DEIS Appx C-25) (23-19) • This area has always been recognized as important mule deer winter range. Both Alts 3 and 4 would finally close it to wheeled motorized vehicles and also recognize it as a winter area closure. This move is strongly encouraged, and if implemented would finally accommodate the requests of MFWP that were made in 1991 to create a motorized area closure for Sweeney Creek to protect critical mule deer and elk winter range, as well as limited old growth ponderosa pine habitat for sensitive species including pileated woodpecker and flammulated owls (MFWP correspondence 1991). In fact, one of the rationales for the Sweeney Cr timber sale was to enhance bitterbrush production on the winter range. This project then extended into the Porky-Roundwood timber sale of 1995. Recognition of a yearlong area closure is due and appreciated. • No alternative closes 1802-B2 to over snow motorized travel, yet this road accesses the non-motorized winter area and the Continental Divide linkage zone in this immediate area is know to be used by lynx, wolverine, wolves. Please close this route to motorized over snow travel. (23-20) • What specific data have been collected during spring/fall training use by National Guard? This is big game winter range. Such a use permit is inappropriate. (23-21). Greenhorn • This leads to an unauthorized road and it is paralleled by 2 other open roads so close 1853-C1 • This is a short dead end in a cluster of roads and is closed in Alt 3 but	(23-20)1802-B2 will be closed in preferred alternative (23-21)Training activities proposed have been under the threshold of 75 people and does not require a special use permit (23-22) FS rd. 1853 will remain open but all other cluster rds. will be closed in preferred alternative.

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should be closed under all options: 1853-D2 Dog Creek • Currently there are 10 road segments – all open in all Alternatives and not necessary for transportation in Sec 34 T11N, R6W. Close 1855-A2. • Close decommission the spur to the SW off of 1855-A1 in Sec 27 • Close all "yellow" unauthorized routes everywhere • Decommission the short dead-end - 622-G1 • A rats nest of roads occur north of Greenhorn. Decommission/remove to improve linkage zone along Continental Divide: 1853-A1, C1, B3, B4, D2, E1. Leaving open 1853 and 1853-D1. (23-22) • Close 1851 since it encourages traffic to unauthorized road 202. If necessary, provide a private access with a special use permit to the inholding in Sec 15. This is important CD linkage. • The following are encourage incursion into Blackfoot winter Travel Plan closed area and are dead-ends: 774 and all spurs; • Very short dead end on CD, close: 4036-A Ophir Creek • Road densities are extreme. All roads marked for closure in Alternative 3 and 4 should be done but in addition, several dead-end roads parallel each other and are currently left open, but should be removed: all 708 spurs except the main; 571-C1; remove all spurs of 4005, 4006, 571, 1855. • In Alts 2 and 4, road 4044-E1 goes deep into the Nevada Mountain Inventoried Roadless Area where both wolverine and grizzly bears are known to den. While doing aerial wildlife surveys, I personally have seen wolverine tracks and den holes on Nevada Mountain. This route dead-ends after crossing through an area restricted to over snow motorized vehicles and penetrates about 1.5 miles into the IRA. • None of the action alternatives adequately address the massive road duplication in this area which inhibits linkage between Nevada Mountain Roadless Area along the Continental Divide to and south of Highway 12, thus hindering	(23-23) Alternative B was developed in response to public comments and includes cover guidelines as follows: Cover should be distributed in a manner that mimics or approximates a natural range of variation (NRV). NRV is generally defined as the spatial and temporal variation in ecosystem characteristics under historic disturbance regimes during a reference period. A reference period should be sufficiently long to include the full range of variation produced by dominant natural disturbance regimes. Fire, wind, and insect/disease outbreaks are examples of disturbances. Subject to Guideline #1, provide cover, if available, between elk security areas to maintain habitat connectivity and facilitate

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movement of wildlife between ecosystems. Alternatives Alternative 1 – Existing Condition/No Action Alternative 1 would retain the existing condition, which in many cases is more friendly toward water, soil, and wildlife resources in that dozens of miles of roads that would be opened in the other 3 action alternatives, would remain closed on a yearlong basis. All "yellow" roads on Alt 1 Travel map are designated closed yearlong, but most of these in the other alternatives would be opened to some type of motorized use, even in Alternative 3. Alternative 1 is the only Alternative that would retain the closure to over snow vehicles in the Limburger Springs area winter range so they could not be used during the hunting season. Alt 1 is clearly more winter friendly to lynx and wolverine than the other alternatives with 31,350 acres open, while Alt 3 and 4 would allow 44,980 acres to be open to over snow vehicles. Alternative 1 would retain the existing Forest Plan Big Game Security Standard (involving a matrix of road density and vegetative cover – all action Alternatives would remove all vegetation cover requirements) and would not implement the proposed security Amendment. The proposed Amendment would remove all vegetation cover requirements for big game security. (23-23) Alternative 2 – Maximum Motorized Use This Alternative does try to rectify on-going natural resource problems and would exacerbate these problems with the maximum motorized use. Alternative 3 – Most Natural Resource Friendly Of the three action alternatives, Alt 3 is generally the best choice for natural resource concerns, but it does not go far enough and could be improved with certain site-specific alterations described previously. It allows more winter motorized travel than Alt 4, and would allow snowmobile use on the previously designated winter ranger in the Spotted Dog-Limburger Springs area. Winter range in this area should be identified on the travel map. Off route over snow use would INCREASE in this alternative over the existing condition from 31,350 to 44,980 acres. These	seasonal movement. Saddles, low divides, and heads of drainages are examples of important landscape features within which cover should be retained when possible in order to provide habitat connectivity. Subject to Guideline #1, vegetation management projects should be planned to recruit or improve cover, where such habitat is limited or not available. Subject to Guideline #1, provide cover, if available; in elk security areas to maintain and/or improve elk security in areas known to be used by elk or that have the potential to be used by elk. The upper third of the slope in moderate to large drainages and lower third of slope in drainage heads are examples of areas that have the potential to be used by elk. Frequent, continuous dense cover, if available, should be provided adjacent to system roads within and between elk security areas to maintain habitat connectivity and elk security. 'Dense' cover may include trees, shrubs, and/or topography among other factors and is site-specific in nature; as such it is purposefully not defined here. Design management activities to avoid reducing hiding cover where recruitment of hiding cover is an objective. (23-24)Thank you for your input Alternative 3 is merely one alternative being considered. The recreation section of chapter 3 of the EIS analyzes the expected impacts of all proposed actions under each alternative to motorized recreationists and hunters.

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limitations should be corrected. Alt 3 is the best of the offered alternatives for grizzly bear, elk, mule deer, Lynx would be better served with over-snow use at existing levels (Alt 1) (Appx C-18). Alt 3 reduces open road density from to 0.1 mi/sq mi, so is clearly the best option for key areas including: Baldy Ridge-Spotted Dog-Kading (23-24) Alternative 4 – HNF Proposed Alternative/Combinations of Alts 1, 2, 3 From a natural resource perspective, Alt 4 is an improvement over Alt 2 but not Alt 3, and only in some cases is it better than the Existing Condition (Alt 1). It does not recognize winter motorized closures. It designates additional motorized trails, highway vehicle use roads, and longer motorized use periods. It does not recognize the Blackfoot-North Divide Winter Travel Plan restrictions to over snow motorized vehicles. (23-25) Alternative L – Landscape Restoration Would allow for reasonable recreational motorized use but maximize implementation of authority, Regulations, and Executive Orders to restore, preserve, and protect water quality, soil and vegetation health, fish and wildlife habitats, and healthy ecosystem function and resilience. Cumulative Effects Thank you for listing some of the projects conducted on the Divide Travel area. Please also include the decision process that was used for each project. Decision notices, RODs, and other decisions associated with these projects will describe stipulated mitigation (and other) measures that were or should have been implemented since the Forest Plan was released in 1986. We notice that not all activities are listed, including the Sweeney Creek or the subsequent Porky-Roundwood timber sale. This area has been particularly damaged by motorized use subsequent to those actions. In addition, inconsistent information about the projects is provided; for example the acreage and board feet of timber	(23-25)Alternative 4 is merely one alternative being considered. The recreation section of chapter 3 of the EIS analyzes the expected impacts of all proposed actions under each alternative to motorized recreationists and hunters. (23-26) The acreage of timber sales is listed in the Cumulative Effects report table for Harvest and Fuels treatments. Acreage was calculated using the Forest Service Activity Tracking System (FACTS). (23-27) The Forest Plan amendment describes cumulative effects of past and planned site-specific and programmatic amendments. See the Cumulative Effects section.

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removal are not listed for the Hope/Snowshoe, Ophir Creek and Cave Gulch timber sales, or the Hazardous Tree Removal project which involved "treatment" 491 miles of road on the HNF. Please provide missing information. (23-26) Not all timber projects listed in Appendix B include acreage involved. In addition to the 1,352 acres that have been "treated, there is the 6,335 acre Telegraph Creek treatment area, and the 491 miles of road in the Hazard Tree Project (9,415 acres or nearly 15 square miles, Table 2 Soils Report Hazard Tree Project). These projects total at least 26.7 square miles of the Helena National Forest. Cumulatively, a 27 square mile area of timber removal cannot be considered of "no significant impact." Clearly there has been little effort to maintain or adhere to Forest Plan Forest Plan Standard 4a for big game security. This inconvenient truth does not absolve the Helena National Forest from working to restore this science-based standard. (23-27) A list of roads that were stamped for Hazardous Tree Removal in 2010, prior to this 2014 Divide travel plan, but which failed to meet the standards for "hazard" under the Wildland Urban Interface, are included in attachment: Roads Analysis 3rd – Divide Landscape (Hazardous Tree Removal/Issues/HHAA). In the case of the Hazardous Tree Removal Project, the Helena Forest Supervisor decided in the Decision Notice and Finding of No Significant Impact: "As part of my Decision I am amending the Forest Plan through a site-specific Forest Plan amendment for this project. Analysis for this project indicated the need for a site-specific Forest Plan amendment to the Helena Forest Plan regarding elk summer and winter range and big game security… As part of my Decision I am also making a site- specific amendment to the Forest Plan. This amendment exempts this project from the Forest Plan big game standards 3 and 4a." There was no actual amendment to Forest Plan wildlife standards 3 and 4a -- the amendment was simply an exemption from compliance with the Helena Forest Plan	(23-28)A site-specific exemption is actually an amendment. There are two types of amendments: site-specific and programmatic. The effects of site-specific project amendments are limited in time and space; programmatic amendments provide direction that would be applied to future management activities (See Forest Plan amendment, Cumulative Effects section). (23-29)Currently, three out of the six elk herd units in the project area meet Standard 4a (See Forest Plan amendment, Comparison of Alternatives/Alternative A).

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by the Helena Forest. (23-28) There is concern that measures to protect natural resources and abide by wildlife standards and guidelines have not been consistently applied as per these decisions. Cases in point would be all the roads and trails that appear on the existing condition Alternative 1 map, but do not appear on the 2006 Travel map, or now (as per Alt 1) have broader use periods than what appears on the 2006 Travel map. Timber sale projects such as Sweeney Creek, Mullan Pass, Hope/Snowshoe, Lava Mountain etc. had associated decisions that may not have been fully followed. For example it took more than a decade to implement road decisions for the Lava Mountain sale, and then only because the public objected to new timber sale action unless the earlier stipulations regarding road closures at Lava Mountain were completed. If decisions and stated rationale behind those decisions are not followed, the consequences cumulatively add up to impacts on natural resources. Such cumulative actions, many of which had associated decisions of No Significant Impact, also are the reason that Forest Plan amendments are now being proposed – because they cannot, through their own doing – meet the Forest Plan standards. This behavior does not justify throwing out the scientifically-based big game standard for security. (23-29) Another example was the proposed Biathlon Project which received a No Significant Impact finding by the Helena National Forest (June 12, 2008), but was challenged in court and was remanded to the HNF based in part on inattention to wildlife linkage/connectivity, cumulative impacts, wetlands, elk standard for hiding cover, among other things. We believe the Forest must be accountable to past decisions, and through future actions the Helena National Forest has the means to rectify past management oversight or actual transgressions. We welcome the opportunity to work with Forest	

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personnel to help identify and promote restorative stewardship projects for natural resources. Monitoring, Enforcement, and Schedule Monitoring "Overwhelmingly, scientists agree that in absence of monitoring, a project may be rendered invalid. While funding for monitoring is almost universally short of what is required to address scientific and technical uncertainties, monitoring is the only way to understand short- and long- term effects of restoration actions."4 And yet, at the April 1, 2014 meeting of Helena Hunters & Anglers Association the District Ranger for the adjoining Blackfoot Travel Planning area stated that because financial resources are limited, it would take years to implement the plan. In the meantime, she stated that all roads that are currently open would remain open. She did not say that all roads that are currently closed would remain closed or that any enforcement would occur. She stated that monitoring and enforcement is a partnership between the FS, the FWP and the public. Of course the public has no authority to enforce anything, thus essentially divesting themselves of the responsibility to monitor and enforce. Enforcement Positive feed-back loops to correct problems on the ground seem to be very limited, only occurring through site specific Emergency Orders. Please provide the steps that must be taken for the public to request and document the need for an Emergency Order. The Divide DEIS acknowledges serious enforcement deficiencies. An active enforcement presence must be guaranteed. What is the point of having a travel plan if it is not enforced? How will the ROD address this very serious issue of enforcement of the travel plan within the Divide Landscape? Just one example: "Illegal OHV use of a pioneered trail around Slate Lake would continue in the absence of effective enforcement." (Appx C-25)	

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Existing travel restrictions up to 2014 have not been enforced for years on the Helena National Forest. Recently the new Helena Forest Supervisor signed emergency orders to require enforcement of the existing (2006) travel plan. What will be the requirements and time frame for enforcement of this new travel plan once it is signed into law? Schedule Fundamental to a functional Travel Plan is an implementation schedule on the order of 5 years or less. Please provide a schedule in the ROD that speaks to site-specific implementation of all actions associated with the Travel Plan. We request expeditious implementation of road closures, decommissioning, removal (re-vegetation in some cases). Recommendation Fashion a modified Alternative 3 that will bring the Divide Landscape, to which this travel planning process is applied, to a restored, ecologically functioning condition. Thank you for addressing these concerns and considering these suggested modifications to the final Alternative. Sincerely, //s// Gayle Joslin 2763 Grizzly Gulch Helena, MT 59601 406.449.2795 1 Joslin, G., and H. Youmans, coordinators. 1999. Effects of Recreation on Rocky Mountain Wildlife – A Review for Montana. Committee on effects of Recreation on wildlife, Montana Chapter of the Wildlife Society. 307pp. 2 Canfield, J. E., L. J. Lyon, J. M. Hillis, and M. J. Thompson. 1999. Ungulates.	

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Pages 6.1– 6.25 in G. Joslin and H. Youmans, coordinators. Effects of recreation on Rocky Mountain wildlife: a review for Montana. Committee on Effects of Recreation on Wildlife. Montana Chapter of the Wildlife Society. 3 Lyon, L. Jack, USDA Forest Service, Intermountain Forest and Ranger Experiment Station; Terry N. Lonner and John P. Weigand, Montana Department of Fish, Wildlife and Parks; C. Les Marcum and W. Danield Edge, Forestry School, University of Montana; Jack D. Jones and David W. McCleerey, USDI Bureau of Land Management; Lorin L. Hicks, Plum Creek Timber Company, inc. Coordinating Elk and Timber Management – Final Report of the Montana Cooperative Elk-Logging Study, 1970-1985. 53pp. 4 F.Brie Van Cleve, University of Washington; Charles Simenstad, University of Washington; Fred Goetz, U.S. Army Corps of Engineers; Tom Mumford, Washington Department of Natural Resources. May 2004. Application of the "Best Available Science" in Ecosystem Restoration: Lessons Learned from Large-Scale Restoration Project Efforts in the USA. Prepared in support of the Puget Sound Nearshore Partnership (PSNP). Lessons Learned from Large-Scale Restoration Efforts in the USA. Technical Report 2004-01. 30p. REFERENCES Lewis & Clark County Commissioners Resolution 2008-57 MFWP correspondence 1991 (Sweeney Creek) American Wildlands. 2008. The Hub Conservation Area – Priority Linkage Assessment. LaSalle Adams Foundation; Mid Shore Community Foundation; Montana, Fish, Wildlife & Parks; New- Land Foundation; Page Foundation; Weeden Foundation; Wilburforce Foundation; Yellowstone to Yukon Conservation Initiative. 207pp. Inman, Robert M., Mark L. Packila, Kristine H. Inman, Rob S. Spence, and Deborah McCauley, DVM. 2008. Greater Yellowstone Wolverine Program – Practical,	

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Science-based solutions for Wolverine Conservation. Wildlife conservation Society. Progress Report: November 2008	
(24) April 27, 2014 Forest Service Personnel, I support the maximum protection of the Continental Divide as a non-motorized corridor, Alternative #3 in the Divide Travel Plan. The public lands that buffer the CDT are very narrow on MacDonald Pass. Sweeney Creek is getting hammered and there need to be additional restrictions and protection for that area. Thank you for considering my comments. Margaret Regan 318 Chaucer St. Helena, MT 59601 406 431-3939	(24-1) Thank you for your input
(25) May 1, 2014 To whom it may concern, I am a Montana native, born in Dillon, and regularly return to my home state to hike in its beautiful mountains. Accordingly, I'm very concerned about the level of ATV and motorized intrusion onto our public lands. Please select Alternative 3 for your travel plan and maintain non-motorized status for the Nevada Mountain proposed wilderness, the Continental Divide Trail from Priest Pass to MacDonald Pass, and the Electric Peak proposed wilderness (including Bison Creek). Thanks for considering my comments, Jesse Feathers 4120 Baker Ave NW Seattle, WA 98107	(25-1) Thank you for your input
(26) May 1, 2014	(26-1) Thank you for your input

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To Whom It May Concern: Please keep Nevada Mountain wild. Even though I live out-of-state, since 1990 I have spent 12 summer vacations in Montana including every one since 2008 except for 2012. And I am planning to return this year. One of the reasons I come is for wilderness and quiet. Thank you, Robert Handelsman 2643 Central Park Evanston, IL 60201	
(27) May 1, 2014 Dear Forest Service, I hiked the Continental Divide National Scenic Trail in 2007. It is so important as a habitat resource, as a place to remain wild, for the soul of the human experience to have the trail and it's surroundings remain non-motorized. I support the non-motorized prescription in Alternative 3 and that the following areas remain non-motorized year round. Nevada Mountain Proposed Wilderness Continental Divide from Priest Pass to MacDonald Pass Electric Peak Recommended Wilderness and adjoining lands, including Bison Creek (27-1) Thank you, James W. Horan Livingston, Montana	(27-1) Please see alternative 5.
(28) May 1, 2014 Dear Sir or Madam, My name is Clarence Sanders and I reside in Bozeman, MT. I am writing to comment on the proposed Divide Travel Plan. I strongly support the non motorized prescription in Alternative 3, which maintains the following areas as Non Motorized year-round:	(28-1) Thank you for your input

Comments	Response to Comments
Nevada Mountain Proposed Wilderness Continental Divide from Priest Pass to MacDonald Pass Electric Peak Recommended Wilderness and adjoining lands, including Bison Creek Adoption of Alternative 3 will serve the enabling objective of multiple use for the Helena National Forest, and also set the stage for preserving some lands within the Forest for quiet recreation. Clarence Sanders 4416 Morning Sun Drive Bozeman, MT 59715	
(29) May 2, 2014 I am writing in support of the non-motorized plan for the Nevada Mountain area. I understand that there are many different user groups that utilize Forest Service land. However the forests and streams of Montana are too special to sacrifice to the uses of mechanized machine. Montana's wild cores are what makes it so superior to any other state in the lower 48. Currently I find myself down in Colorado. The mountains down here are massive and beautiful, but they fail to produce the special feeling one encounters when he or she steps foot into the Montana backcountry. Please act to protect the Wild characteristics and diverse wildlife of Montana's land. It would be a shame to see Montana Coloradoized. Thanks for listening, Zach Cardosi	(29-1) Thank you for your input
(30) May 2, 2014 Please keep the Nevada mountains as non motorized as possible. Cindy Zullo 9410 Trooper Trail, Bozeman MT 59715	(30-1) Thank you for your input
(31) May 3, 2014 Please support the non motorized prescription in Alternative 3 and maintain the following areas as Non Motorized year-round: Nevada Mountain Proposed Wilderness	(31-1)Please see alternative 5.

Comments	Response to Comments
Continental Divide from Priest Pass to MacDonald Pass Electric Peak Recommended Wilderness and adjoining lands, including Bison Creek (31-1) I travel to Montana nearly every summer to backpack in wilderness. I plan to hike the Montana-Idaho portion of the CDT in the next few years and hope it is as close to designated wilderness as possible. I also backpack in my home state of Pennsylvania, and can tell you that there is no comparison to the remoteness of Montana wilderness areas. You have a great gift with the public lands in your state. Please preserve as much as possible for our future generations. Thank you. Tim Began West Chester, PA	
(32) May 3, 2014 I strongly urge USFS to support the non-motorized prescription in Alternative 3 and maintain the following areas as Non-Motorized year-round!: Include: Nevada Mountain Proposed Wilderness Continental Divide from Priest Pass to MacDonald Pass Electric Peak Recommended Wilderness and adjoining lands, including Bison Creek (32-1) Your attention to this most urgent matter would be much appreciated by all present & future generations of all species. Keep it wild! Protect Our Public lands, waters, wilderness, wildlife, health & future. Thank you Lydia Garvey Public Health Nurse 429 S 24th st Clinton OK 73601	(32-1)Please see alternative 5.
(33) May 3, 2014 Dear USFS, Please support and maintain these areas as non-motorized year round: * Nevada Mountain Proposed Wilderness * Continental Divide from Priest Pass to MacDonald Pass	(33-1) Please see alternative 5.

Comments	Response to Comments
* Electric Peak Recommended Wilderness and adjoining lands, including Bison Creek (33-32) Thank you so much for your consideration! Carrie Palmer Livingston, MT	
(34) May 7, 2014 To whom it may concern: I am in support of and would ask you to support the Non-Motorized Year Round plan for Nevada Mountain, the Continental Divide Trail from Priest Pass to McDonald Pass and Electric Peak Recommended Wilderness including Bison creek(34-1). Many thanks for your consideration. Jim Gordon 280 South Fork Road Choteau, MT 50422	(34-1) Please see alternative 5.
(35) May 7, 2014 The Helena National Forest is one of the most abused in the state. You can fix that if you care to. Save what has yet to be trammeled and let the rest of it heal. Tom Petrillo Essex	(35-1) Thank you for your input
(36) May 9, 2014 Terry L. Beaver beaverpt@bresnan.net 623 Highland Helena, MT 59601 May 9, 2014 Road and Trail Infrastructure	(36-1) Thank you for your comment. Please see alternative 5.

Comments	Response to Comments
Forest utilization by the Nation's populace is a highly desired function of the U.S. Forest Service which then garners public support for the agency. The resources of the Forest include the products derived from the biological, hydrological and geological features that occupy their relative positions on the landscape managed by the U.S. Forest Service. Each of these resources is managed for continued utilization as necessitated and directed by our needs and desires. On a local level – the Helena N.F. level – and the Forest Travel Plan level, we recognize that our travel routes have been historically created as a result of Forest utilization, specifically to access the biological, hydrological and geological resources that our nation and every Nation rely upon. As our society has developed, so has our life style. People now have a greater affluence and much more leisure time away from work. Our recreational time has become a large component of our lives within our highly industrialized and computerized society. The Forest recognizes that our expansive and diverse landscapes offer extensive opportunity for many recreational opportunities in the great outdoors. To meld Forest recreational opportunities with the already developed access created by the resource functions of Forest management promotes and enhances the use of infrastructure that currently exists on our National Forest lands. To fail to use or to recognize the potential of using these resources created infrastructures for Forest recreational activity would be short-sighted. To obliterate roads today is to destroy infrastructural investments with potential viable function in the future. Roads from all resource ventures still function as the routes traveled by all Forest users; motorized, non-motorized, hikers, horse back, bicycles and even wildlife.	

Comments	Response to Comments
In my 47 years of working for the Forest Service, I honestly believe that I can count on one hand, the number of forest users I ever encountered in the field who were "bush-whacking" (off of a road or trail). (With the exception of times during hunting season.) When I did, I was shockingly startled, surprised and somewhat fearfully alarmed. Roadways offer a sense of safety-security-comfort, and ease of movement with determined destination. Conversely "bush-whacking" increases hazards, allows feelings of insecurity or apprehension and difficulty in maneuvering. The National Forest System has gone through historical infrastructural obliteration in the 1970's-1980's, when we dozed and burned numerous lookouts, ranger stations and guard stations only to recognize too late that they were inheritantly valuable for re-purposing. Let's not make similar mistakes today by destroying infrastructural investments that continue to persist today because Forest users have established new found purposes extraordinary to their original function. Golden Anchor – Evening Star Road #4100 T8N-R6W sec. 6 and T.8N-R7W sec 1, 12 This road is proposed to remain open on Alternatives 1,2 and 4. Alternative #3 proposes that road 4100 be closed to motorized travel. Road 4100 presently affords the only access to many historic and extant mining properties as well as private home dwelling properties. The Golden Anchor, Evening Star and Negro Mountain mines are readily noted examples of historical preserves that still express the mining and milling residuals of our heritage. These remnants of past livelihood are most highly photographed and interpreted by	

Comments	Response to Comments
mining and milling enthusiasts. This serves a unique recreational opportunity existing in very few Forest locations. If road #4100 were to be closed, it would be totally counter-productive to the proposed opening access from road #1857-A1, the Treasure Mtn. to Negro Mtn. harvest road, which is a highly desirable recreational opportunity. Please retain the present condition of road #4100 as open to motorized travel. (36-1)	
(37) May 10, 2014 I would like to ask you to support the non-motorized prescription in Alternative 3 and maintain the following areas as Non-Motorized year-round: Nevada Mountain Proposed Wilderness Continental Divide from Priest Pass to MacDonald Pass Electric Peak Recommended Wilderness and adjoining lands, including Bison Creek We need to provide better protection for wildlife and wilderness values in these areas, to better protect our ability to enjoy the outdoors without interference from motorized vehicles.(37-1) Thank you. -- Guy Dean Bateman, Ph.D. P.O. Box 1636 Poplar, MT 59255 406-768-5227	(37-1) Please see alternative 5.
(38) May 15, 2014 We have assembled the following information and issues from our members and other motorized recreationists for the project record. These issues surround the proposed closure of motorized sections of the CDNST in the Divide project area. We appreciate the opportunity to provide our comments for the Divide Travel Planning Project.	

Comments	Response to Comments
Thank you for your consideration of our issues and input. Sincerely, /s/ Action Committee on behalf of our 136 members and their families Capital Trail Vehicle Association (CTVA)[1] P.O. Box 5295 Helena, MT 59604-5295 CTVA_Action@q.com Contacts: Doug Abelin at (406) 461-4818 dabelin@bresnan.net Don Gordon at (406) 458-9577 DGordon315@aol.com Ken Salo at (406) 443-5559 ksalo245@msn.com George Wirt at (406) 227-6037 G_wirt@msn.com CC: Dave Koch. President CTVA [1] CTVA is also a member of Montana Trail Vehicle Riders Association (mtvra.com), Blue Ribbon Coalition (sharetrails.org), and New Mexico Off highway Vehicle Alliance (nmohva.org),. Individual memberships in the American Motorcycle Association (ama-cycle.org), Citizens for Balanced Use (citizensforbalanceduse.com), Families for Outdoor Recreation (ffor.org), Montana 4X4 Association, Inc. (m4x4a.org), Montana Multiple Use Association (montanamua.org), Snowmobile Alliance of Western States (snowmobile-alliance.org), Treasure State Alliance, and United Four Wheel Drive Association (ufwda.org) The historic motorized access and recreational opportunities within the Helena National Forest are where we go to enjoy motorized recreation and create those memories of fun times with family and friends. Management of these lands for multiple-uses including reasonable motorized use allows the greatest enjoyment of these lands by the widest cross-section of the public to continue. These lands are designated as multiple-use lands and we ask that management for multiple-use continue.	(38-1) Thank you for your input, please see Recreation section of the FEIS and the Recreation specialist report.

Comments	Response to Comments
We ask that the Divide Travel Planning Project adequately address the following significant issues: 1. If further motorized closures of the CDNST are pursued, then a significant issue to motorized recreationists is the re-opening of all CDNST motorized closures enacted to date including Homestake Pass north and south, Bison Mountain North and South, Sugarloaf Mountain, Black Mountain North, Flesher Pass to Rogers Pass, McDonald Pass to Jericho Creek, Bison Mountain, and Thunderbolt Mountain(38-1). These motorized closures were enacted without the correct consideration of the requirements of the CDNST enabling law, and CDNST EIS and ROD. They were illegal motorized closures and corrective action must be taken to resolve these past illegal motorized closure actions as part of this decision.	(38-1)Thank you for your input.
2. The Continental Divide trail between McDonald Pass and Jericho Mountain and Ontario Creek over Bison Mountain to the BDNF were illegally closed to motorized recreationists by past actions. The motorized CDNST closures proposed as part of the draft Blackfoot Record of Decision are illegal. The Divide travel plan should re-evaluate that closure and mitigate for all illegal closures by re-opening these sections of CDNST to motorized recreationists as required by the original legislation.(38-2) Further documentation of this illegal closure is provided in the followings sections.	(38-2)Thank you for your input.
3. Non-motorized reaches of the CDNST receive very little use. Recent inspection of a new non-motorized section of the CDNST near Burnt Mountain in the Beaverhead-Deerlodge National Forest (see photographs) could not find any sign of foot prints or use. (editorial note – photos pertaining to the these comments were attached, but not included in this table. They are available for viewing at the HNF office). A CTVA member monitored game cameras on a section of the CDNST near Helena for a 3 month period from June to August of 2013. These cameras did not pick up any non-motorized users during this period. At the same time, we have observed that motorized sections of the CDNST see significant motorized use and corresponding benefits. By looking at actual miles traveled and hours spent recreating the obvious best use of the CDNST is for shared multiple-use.(38-3) This	(38-3) Thank you for your input.

Comments	Response to Comments
is also true when considering our limited and valuable public taxes and funds. Single-track reaches should be designated for motorcycle and mountain bike use, 48" width areas should be designated for ATV use, and reaches wider than 48" should be designated for UTV and 4x4 use. (38-3) 4. Motorized recreationists keep trails open for all users including motorcycle single-track trail. This issue is especially important during this period of intense downfall from trees killed by beetle infestations. A once a year trail clearing by a Forest Service trail crew is no longer adequate to keep trails open. Past closures have proven that motorized trails that have been closed to motorized use have become impassable within 3 to 5 years. Examples include the Brooklyn Bridge route in the Helena National Forest and the Middle Fork of Rock Creek in the Beaverhead-Deerlodge National Forest. At the same time motorized recreationists have proven that they are willing to work to keep trails open so that all visitors are able to enjoy them. This ability to keep trails open for use by everyone is a significant advantage to designate all routes within the project area open for motorized use. (38-4) 5. We are very concerned about the closure of any motorized routes to create CDNST. The closure of any existing motorized route to create a non-motorized segment of the CDNST was not authorized by the National Trail Systems Act and in the direction given in a policy memorandum by the Deputy Forester in 1997. 6. Specifically, the National Trails System Act (16 U.S.C. 1241) (http://nplnews.com/toolbox/fedlaws/68nattrails.pdf) was the authorizing law for Continental Divide National Scenic Trail. The general criteria as stated in the National Trail Systems Act, is that "the use of motorized vehicles by the general public along any national scenic trail shall be prohibited". However, in the case of the Continental Divide National Scenic Trail (CDNST), an exception is made for "the use of motorized vehicles on roads which will be designated segments" (Section 5 (5), page 2-6). The law also allows uses (including motorized vehicle use) along the CDNST "which will not substantially interfere with the nature and	(38-4)Thank you to all user groups for maintaining the trails.

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purposes of the trail" where such uses are permitted at the time of designation (Sec. 7 (c), page 2-21).	
7. Specifically, the National Trails System Act (16 U.S.C. 1241) provided for "(6) DIVERSIFIED TRAIL USE.—(A) REQUIREMENT.—To the extent practicable and consistent with other requirements of this section, a State shall expend moneys received under this part in a manner that gives preference to project proposals which—(i) provide for the greatest number of compatible recreational purposes including, but not limited to,	(38-5a)Thank you for your input.
those described under the definition of ''recreational trail'' in subsection (g)(5); or (ii) provide for innovative recreational trail corridor sharing to accommodate motorized and non-motorized recreational trail use.	(38-5b) Thank you for your comment.
Both sections of proposed trail are outside the wilderness area and would make outstanding shared-use (motorized and non-motorized) trails. Development as shared-use trails would better meet the guidelines of the National Trail Systems Act for "innovative" solutions.(38-5a)	
8. Specifically, the National Trails System Act (16 U.S.C. 1241) defined RECREATIONAL TRAIL.—The term ''recreational trail'' means a thoroughfare or track across land or snow, used for recreational purposes such as bicycling, cross-country skiing, day hiking, equestrian activities, jogging or similar fitness activities, trail biking, overnight and long-distance backpacking, snowmobiling, aquatic or water activity and vehicular travel by motorcycle, four-wheel drive or all-terrain off-road vehicles, without regard to whether it is a ''National Recreation Trail'' designated under section 4 of the National Trails System Act (16 U.S.C. 1243). (38-5b)	(38-5c) Thank you for your input
9. The language cited above from the National Trails System Act clearly indicates the intent of the original act. The creation of non-motorized sections of the CDNST by converting motorized sections is not within the intent of the original act. (38-5c)	(38-6a) The preferred alternative is a mix of parallel routes and non-motorized opportunities, none of these strategies are illegal in any way.
10. The Beaverhead-Deerlodge National Forest has properly acknowledged the	(38-6b) Thank you for your input

Comments	Response to Comments
National Trails System Act and has not closed any motorized sections of the CDNST since the CTVA appeal of the Nez Perce trail in 2004. Recent CDNST projects in the BDNF have used the strategy of constructing non-motorized routes parallel to existing motorized CDNST trail sections. We support this strategy to avoid illegal closure of motorized sections of the CDNST. (38-6a) 11. In too many cases a couple of non-motorized users have been able to displace hundreds of motorized users. It is not reasonable or fair to allow a few non-motorized recreationists to convert a motorized trail used by hundreds of motorized recreationists for their exclusive use. Unfortunately, sections of the CDNST have been created with this approach. This approach must not be perpetuated and past motorized closures should be mitigated. (38-6b) 12. Now the 1997 Policy Letter by the Deputy Chief of the Forest Service (http://www.mtvra.com/Docs/CNDST%20July%201997%20Memo.pdf) is being used by the Forest Service to justify conversion of motorized, multiple-use sections of the CDNST to non-motorized use only. Our interpretation of that policy memo is completely different. The 1997 directive to Regional Foresters clearly says that conversion of the CDNST to non-motorized applies only to "newly constructed trail segments" and that reaches of the existing CDNST that use existing roads and trails should continue to accommodate motorized use. (38-6c)	(38-6c) Thank you for your input.

Comments	Response to Comments
United States Department of Agriculture Forest Service Washington Office 14th & Independence SW P.O. Box 96090 Washington, DC 20090-6090 File Code: 2350 Route To : * Date: July 3, 1997 Subject: Continental Divide National Scenic Trail - Motorized Use To: Regional Foresters This memorandum is to clarify Forest Service policy concerning whether the Forest Service may open to motorized use newly constructed portions of the Continental Divide National Scenic Trail (CDNST). The National Trails System Act ("Trails Act") is ambiguous as to motorized use on the CDNST. Section 7(c) of the Trails Act sets a general standard for prohibiting motorized uses on National Scenic Trails. 16 U.S.C. 1246(c). However, there is special language in subsections 5(a)(5) and 7(c) of the Trails Act referring to motorized uses on the CDNST. That special language provides that motorized use may be permitted on segments of the CDNST where such use will not "substantially interfere" with the nature and purpose of the trail and where, at the time of designation, such use was allowed by administrative regulations. To clarify our policy regarding newly constructed segments of the CDNST, the following additional direction is provided. When designated by Congress, the route of the CDNST followed some segments of primitive roads on which motorized vehicle use was allowed. The special language of subsections 5(a)(5) and 7(c) was intended to allow continued motorized use of such roads. However, as the CDNST is further developed, it is expected that the trail will eventually be relocated off roads for its entire length. It is the intent of the Forest Service that the CDNST will be for non-motorized recreation. As new trail segments of the CDNST are constructed to link existing non-motorized trail segments together, and to reroute the CDNST off of primitive roads or other routes where motorized travel is allowed, motorized use should not be allowed nor considered. Allowing motorized use on these newly constructed trail segments would substantially interfere with the nature and purpose of the CDNST. If any newly constructed trail segments of the CDNST are currently allowing motorized use, that motorized use should be stopped as soon as practicable, but not later than January 1, 2000. This Office of the General Counsel has reviewed and concurs in this policy directive. Questions or comments about the above direction should be directed to Jim Miller at J.B.Miller:w01c or by telephone at 202-205-1313. /s/ Janice H. McDougle (for) ROBERT C. JOSLIN Deputy Chief, NFS cc: Glacier National Park, Yellowstone National Park, BLM - MSO, American Hiking Society, Continental Divide Trail Society, Continental Divide Trail Alliance 13. Past NEPA action which addressed continued motorized use of the CDNST is	

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(39) May 19, 2014 Dear Helena National Forest, On behalf of Helena Hunters and Anglers Association, Clancy-Unionville Citizen's Task Force, Anaconda Sportsman's Club, and the Montana Wildlife Federation, please find attached our collective comments on the Divide Travel Plan Programmatic Plan Amendment for big game security. Thank you. <<...>> Gayle Joslin Helena Hunters & Anglers Association 219 Vawter Street Helena, MT 59601 406-449-2795 joznpoz@bresnan.net Divide Travel Plan Programmatic Plan Amendment for Big Game Security Dear Forest Supervisor Avey: The following comments are submitted in response to the Helena National Forest Divide Travel Plan Programmatic Plan Amendment for Big Game Security. We request these comments be entered into the public record, and fully analyzed/addressed in the Final EIS. The Helena Hunters and Anglers Association (“HHAA”), Clancy-Unionville Citizens Task Force, and Anaconda Sportsman’s Club offer the following comments to implementation of a scientifically unsupported proposed amendment to Helena Forest Plan Standard 4a for big game security (DEIS, Appendix D). The proposal would negatively affect big game security on Elk Herd Units (EHU) throughout the planning area, and have an even more acute effect on those EHUs that do not fall entirely within the Administrative Boundary of the Helena National Forest. Amendment Alternative B removes the hiding cover component of security. In addition, all necessary criteria to evaluate the proposed amendment are not	

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described and therefore cannot be evaluated. The focus of the amendment erroneously is based on elk population rather than bull elk survival – the metric that defines security on public lands. The participants in this comment include: Helena Hunters & Anglers Association Contact: Stan Frasier, President and Gayle Joslin, Board Member 219 Vawter Street Helena, MT 59601 Sfrasier@mt.net Helena Hunters & Anglers Association is a nonprofit Helena, Montana based organization dedicated to protecting and restoring fish and wildlife to all suitable habitats and to conserving all natural resources as a public trust, vital to our general welfare. HHAA promotes the highest standards of ethical conduct and sportsmanship, and promotes outdoor recreation opportunity for all citizens to share equally. Members of HHAA depend on healthy, functional, intact public lands of the Helena National Forest because they sustain and nurture our way of life. Clancy-Unionville Citizens Task Force Contact: Kathy Lloyd 503 State Street Helena, MT 59601 Drakekath@hughes.net The Clancy-Unionville Citizens' Task Force (CUCTF) is a non-member public benefit group (filed with the State of Montana) formed in 1997. CUCTF is concerned with land management issues on public lands south of Helena. CUCTF is composed of local residents who use the public lands near our homes for non-motorized recreation, hunting, hiking, wildlife viewing, and public educational programs. For the last 17 years CUCTF has actively engaged the Helena National Forest in productive discussion about travel planning for this area. A Record of Decision for the Clancy-Unionville area was signed in February 2003, and since that	

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time CUCTF has been vigorously involved in trying to get it fully implemented. CUCTF is commenting on the proposed Forest Plan amendment 4a for the Divide Travel Plan because we believe it will have consequences upon the Clancy-Unionville travel planning area. Anaconda Sportsman's Club Contact: Chris Marchion 2105 Garfield Anaconda, MT 59711 cjmarchion@outlook.com The Anaconda Sportsman's Club is a member-based organization whose core values depend upon Montana's exceptional wildlife resource and the landscapes that sustain us all. We are dedicated to the heritage and tradition of hunting and conservation of our wildlife legacy. Many of our members have a long-time history of bird and big game hunting the Divide landscape. Montana Wildlife Federation Contact: Nick Gevock 5530 N. Montana Ave. Helena, MT 59602 ngevock@mtwf.org The Montana Wildlife Federation was founded in 1936 when landowners and sportsmen banded together to restore depleted wildlife in our state. We work every day to ensure abundant wildlife, healthy habitat and public hunting and fishing opportunity to enjoy our public fish and wildlife resources. We are comprised of 20 affiliate clubs from throughout the state and more than 5,000 members who are spread across the country. MWF is our state's oldest and largest wildlife conservation organization. Collectively, we are commenting on the following issues associated with the proposed amendment to existing Forest Plan Standard 4a for big game security: Comment	

Comments	Response to Comments
1. The purpose and need for the proposed amendment disguises the motivation behind an amended big game security standard. 2. Best Available Science is not being used to develop the proposed amendment. 3. The programmatic amendment fails to follow all necessary criteria as set forth in the Hillis Model and does not describe referenced guidelines for its application. 4. The proposed amendment must recognize the open, topographically gentle "east-side" Helena Forest – and develop alternatives that accurately describe the existing landscape and its potential. 5. The EIS has misused the State of Montana's Elk Plan in its use of population data to reflect elk security and thus gives misleading justification for amending Big Game Standard 4a (security). 6. To be effective, any big game security standard must be applied for the duration of the hunting season, from September 1 to December 1. 7. The cumulative impacts of the proposed Big Game Security amendment upon other Forest Plan Standards have not been adequately evaluated. 8. Cumulative Forest Service actions have led to a tipping point for big game security across much of the Helena National Forest. 9. The Helena National Forest inappropriately proposes a unique amendment for the big game security standard for the Divide Travel Plan area. 10. Inadequate and unfunded maintenance, monitoring, and enforcement of roads/trails and motorized travel as allowed under the Divide Travel Plan, virtually assures that any standard for big game security will not function properly. The proposed amendment to Big Game Standard 4a of the Forest Plan of the Helena National Forest will impact recreational activities of members by reducing wildlife habitat and recklessly implementing a model that has not been validated for "east-side" forests – something that authors of the model cautioned against. In addition, the model being used for the amendment is not being applied as was defined by authors of the model 39-1). The issues to which the groups below object, and suggested remedies, are provided below in the substance of this comment.	(39-1) Forest Plan amendment Alternative B actually follows Hillis et al. (1991) – the authors of the security methodology in question – who emphasize that "strict adherence to the guidelines should be avoided".

Comments	Response to Comments
Thank you for this opportunity to comment on the proposed big game security amendment (Helena Forest Plan Standard 4a) as part of the Divide Travel Plan process. Sincerely, Stan Frasier, President Helena Hunters & Anglers Association Gayle Joslin, Member Helena Hunters & Anglers Association Chris Marchion, President Anaconda Sportsman's Club Kathy Lloyd, President Clancy-Unionville Citizens Task Force Nick Gevock, Conservation Director Montana Wildlife Federation	
Comment 1. Purpose and Need statements in the proposed amendment disguises the motivation behind an amended big game security standard. The stated Purpose and Need in the DEIS does not honestly explain that the HNF has altered the landscape through impacts from previous cumulative decisions during which Forest Plan standard 4a (among other standards) has been ignored to such a degree that the HNF is compelled to now redesign the standard in order to meet a new, lower standard.	Refer to response 39-2 & 39-3.
The stated Purpose and Need to amend the Divide big game security standard is: "This programmatic Forest Plan amendment for the Divide Travel Management project area is needed to more closely align current science, local conditions, and other information with the needs of big game, particularly elk, to meet the intent of the Forest Plan. It considers the impacts of open motorized routes on elk security, establishes blocks of secure habitat, and can be measured regardless of changes in hiding cover. While the proposed amendment decouples hiding cover from security during the hunting season, several Forest-wide and Management Area standards remain in place that govern management of hiding cover." (DEIS Appx D, pg 1)	(39-2)Three out of six elk herd units in the project area currently meet Standard 4a (See the Forest Plan amendment, Comparison of Alternatives/Alternative A).
The existing big game security standard has been an inconvenient obstacle to a variety of HNF actions. Rather than abide by the limitations imposed by the standard, the HNF chose to ignore them stating: "The assumptions built into the	

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existing (1986) standard 4(a) have not proven useful in gauging or guiding management activities under the Forest Plan.“(39-2) There is an attempt to correlate elk populations instead of bull elk survival with the standard by stating: “Actual elk populations and trends as monitored over the last twenty six years simply do not correlate with this existing standard or its assumptions. Elk numbers have consistently increased during this time period and the existing standard needs to be revised to address recent elk management challenges.” For the travel planning process, efforts to amend the big game security standard have been challenging, because it represents an inconvenient truth that the HNF has over-harvested its forests and over-roaded its lands. The amendment contends that the existing security standard: “places impractical constraints on Forest management and on the ability of the public to use the Forest.” “Impractical constraints on the ability of the public to use the Forest” does not apply to public hunters, public hikers, public mountain bikers, but rather to motorized users, who have the same access to the Forest that the other public users have. Purpose and need (40 CFR 1500.1(b)) – the HNF contends it needs more management latitude, but the amendment does not assure it will benefit big game. “High quality” and “accurate scientific analysis essential to implementing NEPA” has not been displayed. The solution to the problems is provided in big game Standard 4: “implement an aggressive road management policy.” A Forest Plan standard is designed to be just that: a standard for the Forest. A travel plan should be designed to comply with a Forest Plan Standard, not the other way around. In the case of Divide, the proposed big game Amendment is subservient to the Divide Travel Planning Area. This backwards linked action does not disclose the	(39-3) (1a) The Forest Plan amendment includes an analysis of potential elk security which addresses the status of security assuming all Forest Roads are closed and the status of cover. That analysis concludes that “[s]ome of the herd units experience considerable increases in security by closing all Forest roads (Greenhorn, Little Prickly Pear – Ophir, and Quartz Creek). However, as previously noted several of the Forest roads that are assumed closed as part of this exercise are located outside of the Travel Plan project area and have already been subject to a travel plan decisions (i.e. Soundwood, Clancy Unionville Vegetation Manipulation and Travel Management Project)”. And, “[p]otential cover includes existing hiding cover (as described above) and capable cover, i.e. those areas that are naturally capable of having relatively dense (> 40%) canopy cover. This is generally provided by Douglas-fir, subalpine fir, spruce and lodgepole pine…” (1b) As part of the Divide Travel Plan, an alternative to meet Standard 4a was considered but not fully developed. In that scenario, 5 out of 6 EHUs would meet Standard 4a (compared with 4 out of 6 in Alternative 5, the most aggressive Alternative in terms of road closures during the hunting season). Although that analysis indicates that it’s possible for the Forest to close enough roads in the Quartz Creek EHU to achieve compliance with Standard 4a, several of those road miles over which the Forest has discretion are located outside of the Travel Plan

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influence that the Travel Plan decision will have on the big game security amendment for the Divide. 1a. Comment Suggestion: The purpose and need for amending the Forest Plan standard for big game security should be to define a method to bring the forest into compliance with elk security literature and science based habitat capability of the HNF that addresses the needs of bull elk security on public lands. 1b. Comment Suggestion: "Implement an aggressive road management policy" in compliance with HNF Forest Plan Standard 4. (39-3) Comment 2. Best Available Science is not being used to develop the proposed amendment. Pursuant to NEPA, information included in NEPA documents "must be of high quality" and "accurate scientific analysis [is] essential to implementing NEPA." 40 C.F.R. § 1500.1(b). While a DEIS may not be expected to reference or rely on every study or opinion, the state of scientific knowledge on a particular subject must be fairly represented in a balanced manner. Moreover, a DEIS must contain a reasoned analysis in response to conflicting data or opinions on environmental issues. The Forest Service's decision to replace Standard #4a with an untested, hypothetical method is not based on the best available science regarding big game management. Hiding cover is a crucial component of elk security, particularly for bull elk. The proposed amendment inappropriately removes all cover requirements for hunting season security – cover that is critically important on the open, topographically gentle "east-side" Helena Forest – an action that the scientific literature clearly does not support.1, 2, 3, 4, 5 While much of the literature focuses on road densities, none of the literature indicates that hiding cover is unimportant for bull elk survival. With respect to the hunting season and the need for hiding cover, abundant literature indicates: "elk that survived, decreased movements and showed avoidance of open areas" ie. They seek hiding cover. The "security area" approach replaces the "road density/hiding cover index" as the Forest Plan standard for gauging the vulnerability of elk to hunting. The amendment derives from the Hillis methodology (1991) and adopts specific guidelines for its	project area and have already been subject to a travel plan decision (i.e. Clancy Unionville Vegetation Manipulation and Travel Management Project). The few miles of open roads in Quartz Creek EHU that could be closed as part of the Divide Travel Plan decision access private land. The Greenhorn EHU would remain out of compliance with Standard 4a because the Forest simply does not have sufficient road closure discretion. See Forest Plan amendment Comparison of Alternatives/Alternative A/Discussion and Chapter 2 of the FEIS.

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application from Recommendations for Big Game Habitat Management on the Custer, Gallatin, Helena, and Lewis and Clark National Forests (MDFWP and USDA Working Group 2013). In discussing the proposed big game amendment, the following statement clearly reveals that the HNF has strayed from the original travel plan intent of the Forest Plan, and has not aggressively implemented Standard 4 ("implement an aggressive road management policy"), when it states (DEIS Appendix D-17): "Alternative A only applies to roads as originally envisioned in the Forest Plan." 2a. Comment Suggestion: Utilize the published literature to acknowledge that hiding cover is a crucial component of elk security, particularly for bull elk. (39-4)	(39-4) The Forest Plan amendment recognizes the role of cover; Alternative B reflects that by including cover guidelines (See Forest Plan amendment, Alternative Description/Alternative B).
Comment 3. The programmatic amendment fails to follow all necessary criteria as set forth in the Hillis Model and does not describe referenced guidelines for its application. "The amendment derives from the Hillis methodology (1991) and adopts specific guidelines for its application from Recommendations for Big Game Habitat Management on the Custer, Gallatin, Helena, and Lewis and Clark National Forests (MFWP/FS Big Game Working Group, 2012)." (DEIS 491) The referenced "specific guidelines from Recommendations for Big Game Habitat Management" are not described or further referenced, yet the entire amendment is said to be based upon them. Lacking specifics regarding the guidelines of a working group document, it must be assumed that the Hillis Model as described in peer-reviewed literature is being applied. (39-5) The Hillis Model7 defines three criteria that are required to make the model function for west-side forests, with a caveat that all three must be increased in areas having more open cover and less topographic relief -- such as east-side forests. These criteria include: · size of forest cover blocks: larger is better; minimum size of 250 acres; cover blocks are enhanced with least edge/more topography/important natural features	(39-5) Specific recommendations from the U.S. Forest Service and Montana Department of Fish Wildlife and Parks Collaborative Overview and Recommendations for Elk Habitat Management (2013) [Recommendations] have been applied as follows: The Recommendations paper suggest the following: In regards to elk security, the period September 1 – October 14, i.e. for the archery season, in addition to the standard October 15 – November 30/December 1 time period, i.e. the rifle season should be considered relative to public routes used by any motorized vehicle. Forest Plan amendment Alternative B defines the hunting season as 9/1 to 12/1 to recognize the effects of archery season on elk. …MDFWP and FS biologists should jointly develop specific recommended strategies to address the situation (including the use of Hillis et. al. 1991 concepts). Recommended habitat management strategies may ….increasing the minimum size of

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· distance from roads: minimum of ½ mile; road location; less cover and terrain = more distance; the presence of closed roads inside a security area reduces its effectiveness · proportion of Herd Unit needed to provide security: "habitat analysis unit" is defined by the elk; analysis units should not be adjusted for land ownership; instead they should reflect the cumulative habitat conditions perceived by elk; minimum percentage of an analysis area that must function as security is 30% - more when bull survival objectives must be met; reduce fragmentation · Finally, the authors recommend that all criteria should be enlarged for more open landscapes – such as those east of the Continental Divide.	security areas (e.g. 500 acres, etc.)…Forest Plan amendment Alternative B was developed collaboratively with MDFWP to reflect local conditions. Security areas were increased to a minimum of 1000 acres to reflect those conditions (See Forest Plan amendment, Alternative Description/Alternative B).
Actual language from The Hillis Model (1991), with regard to the size of cover blocks, states: "…managers should strive to retain, perpetuate, or replace the largest security areas possible." In the Clark Fork area where the Hillis Model was developed, "cover is dense, terrain is steep, and forest communities are largely un-fragmented… under less favorable conditions, the minimum [cover patch size] must be greater than 250 acres." Conditions on the Helena National Forest can be described as less than favorable since dense cover is not characteristic of the Helena, the terrain is relatively gentle, and the forest communities are overly endowed with motorized routes (there are approximately 2000 miles of road on the HNF according to the 2004 HNF Roads Analysis). (39-5a)	(39-5a) Refer to response 39-5.
The shape of the cover patch is important. A cover patch with the least amount of edge and the greatest width generally will be the most effective(39-6); i.e. shape of secure cover patch should be round or condensed; long irregularly shaped cover patches need greater buffers or they will not provide adequate security.	(39-6)Forest Plan amendment Alternative B defines elk security as "..a proportion of an elk herd unit within the administrative boundary of the Helena Ranger District that consists of an area of at least 1000 acres in size that is at least ½ mile from a motorized route open to the public between 9/1 and 12/1. Security blocks are adjusted for constrictions less than or equal to ½ mile in width. Security is calculated across all ownerships within the administrative boundary". Width and shape are accounted for through this definition ((See Forest Plan amendment, Alternative Description/Alternative B
Actual language from Hillis et al. (1991) with regard to distance from roads states: "Generally, security areas become more effective the farther they are from an open road. … the minimum distance between a security area and an open road should be one half mile… Failure to accomplish this function will reduce the effective size of the security area and may render it ineffective." (Ibid.)	Forest Plan amendment Alternative B includes a cover analysis as part of the Comparison of Alternatives (See that section in the Forest Plan amendment).

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Analysis of existing cover patches within the Divide Travel area are not provided—information that is necessary to assess whether the proposed amendment would even come close to meeting the provisions of the model.(39-7) Open road location plays a large role in defining whether cover patches will actually provide security, particularly where they funnel people to the edge of security areas or when they occur above and below security patches. "When cover is poor and terrain is gentle, it may require a distance of more than one half mile from open roads before security is effective." (Ibid.) One-half mile is accepted as the standard without discussion, even though circumstances may require a greater distance. As Hillis notes, even closed roads compromise security areas: "as closed road densities increase both within the security area and buffer…the minimum distance between open roads and security areas must increase." (Ibid.) (39-7) In open country this caveat is even more important because areas that might be considered "secure" are not when they are compromised by miles of closed roads that serve as easy travel conduits for hunters. This fact is not discussed in the DEIS. (39-7)	(39-7)Forest Plan amendment Alternative B includes a discussion of the effects of closed roads on elk security with the following conclusion: "The presence of a motorized route closed during this period did not disqualify an area from being considered a security area or intermittent refuge area. These closed routes could facilitate hunter access and improve hunter success; likely a function of elk remaining in the 'secure' area longer and in greater numbers (Basile and Lonner 1979, Hillis et al. 1991, Unsworth and Kuck 1991). However, if security and/or intermittent areas were determined by open and closed motorized routes, several areas that currently do provide security for elk – or could upon implementation of the Divide Travel Plan decision - would have been eliminated from consideration." See Forest Plan amendment, Comparison of Alternatives/Alternative B/Discussion. See also the section Alternative Description/Alternative B/Discussion.
Actual language from Hillis et al. (ibid.) with regard to analysis unit states: "First, a standardized 'habitat analysis unit' (Lyon and Christensen 1990) must be described. To be biologically meaningful, analysis unit boundaries should be defined by the elk herd home range (Edge et al. 1986), and more specifically by the local herd home range during hunting season. Typically, the hunting season home-range includes the local herd transitional-range and at least the upper edge of winter range. These boundaries should be verified in advance by radio telemetry, particularly where elk vulnerability is at issue. Without telemetry data, biologists should test their home-range predictions against the experience of reliable local hunters and outfitters.	(39-8)Forest Plan amendment Alternative B discusses the rationale for confining the security standard to that portion of the herd unit within the administrative boundary. Private land within that area is included in the definition and analysis. The

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Analysis units should not be adjusted for land ownership; instead, they should reflect the cumulative habitat conditions perceived by elk." In fact, the proposed amendment seeks to modify the Hillis Model by not applying it to the Elk Herd Unit, but rather the HNF Administrative Boundary – this is specifically what Hillis et al. say not to do (39-8). The proposed programmatic amendment language is as follows (DEIS Appendix D-17): "Implement an aggressive road management program to maintain or improve big game security. This will be accomplished in the Divide Landscape of the Helena National Forest by way of the following: When security areas comprise more than 30% of that portion of an elk herd unit within the HNF administrative boundary, management activities shall not reduce the amount of security areas during the rifle season (approximately October 15 through December 1) to less than 30%. Where security areas comprise 30% or less of that portion of an elk herd unit within the HNF administrative boundary during the general rifle season, management activities shall not result in a further reduction." So the Amendment would allow reduction of security even though much of the area needs security greater than 30% as noted by Hillis et al. due to bull elk vulnerability. "Elk vulnerability increases when less than 30% of an analysis unit is comprised of security areas. (Canfield 1991) Where bull survival objectives are high, it may be necessary to retain greater than 30% of the analysis unit in security… Minimum percentage of an analysis area that must function as security is 30%-- more when bull survival objectives must be met." The Hillis Model clearly indicates that a minimum of 30% of the EHU or larger area is necessary for security. However, the proposed amendment makes no provision for more than 30% security even though the Helena National Forest is lacking in rugged, broken topography, lacks continuous conifer cover and is highly fragmented with roads. Neither does the proposed amendment describe, for this particular landscape, what the ideal security percentage should be. However, Hillis et al. (1991) is clear that provisions of the Model would have to be expanded for open,	discussion in the Forest Plan amendment points out that herd units in the Divide landscape are quite large, even those portions within the administrative boundary. See Forest Plan amendment, Alternative Description/Alternative B/Discussion.

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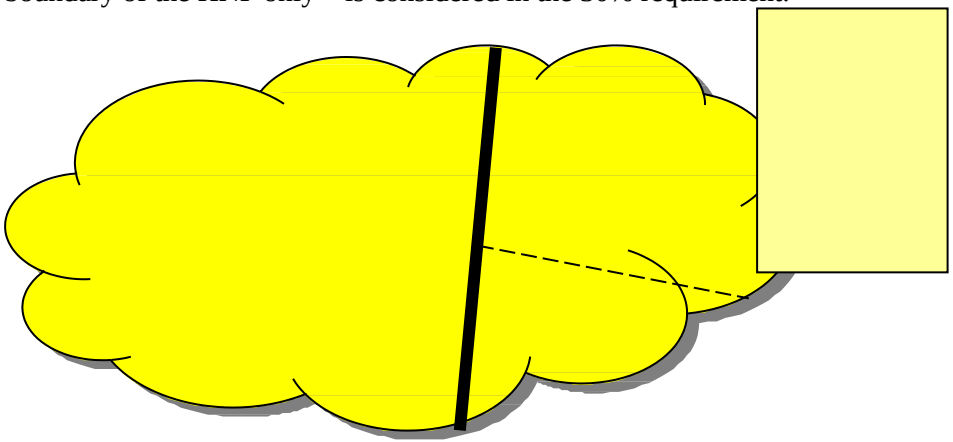
gentle forests such as on the Helena Forest. Again, the proposed amendment specifically thwarts this most important provision by allowing for only 30% elk security, and then only within the HNF Administrative Boundary. Limiting application of security to within the Administrative Boundary only, would artificially shrink big game security even further. The schematic below demonstrates shrinkage of security when the administrative boundary of the HNF only – is considered in the 30% requirement.  HNF to right of the line is all in forest cover. To right of the line is 30% of the EHU. To the left of the line is private or other ownership that has no forest cover. Below the dotted line would be 30% of total forest cover, or only 11% of EHU. Elk Herd Unit (EHU) is designated above by seasonal elk distribution (yellow area). In the above example – to the right of the line is forested cover (entirely and exclusively on HNF and making up roughly 30% of the total EHU but 100% of the security cover). Left of the line is private and state land with little or no forest cover. The entire EHU falls within the current forest plan standard 4a for security for an Elk Herd Unit and requires retention of all forest cover because it constitutes 30% of	(39-9)For the purposes of analyses and cumulative effects of past, ongoing, and reasonably foreseeable activities, the herd unit will continue to serve as the basis for those analyses. Furthermore, other Forest Plan standards that govern hiding cover will remain in place – in other words, it's not realistic to assume that in this example 2/3 of forested cover within the administrative boundary. See the Forest Plan amendment, Background section, for the list of standards that will remain in place.

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the EHU. An Elk Herd Unit might extend across various land ownerships (as described in the Hillis Model) but only that portion within the HNF Administrative Boundary would be considered when management activities are planned. If the EHU consisted of 30% forested cover, but most or all of that cover occurred on the HNF (a very real example), the amendment would then potentially allow removal of 2/3 of the forest cover within the Administrative Boundary (39-9). This would meet the proposed standard by allowing 30% cover to remain within the administrative boundary. But actually, across the entire EHU, cover would be depleted down to 11% over the elk herd unit. In short, the new proposed standard's criteria of 30% security within the Administrative Boundary of the HNF completely circumvents the intent of the Hillis Model which states: "Analysis units should not be adjusted for land ownership; instead, they should reflect the cumulative habitat conditions perceived by elk." (Hillis et al. 1991, pg. 39) Our example is quite realistic in that the Helena National Forest, by definition, is where the trees are and thus big game security cover occurs largely on National Forest lands. In other documents (Blackfoot Travel Plan DEIS-494) the HNF notes the following, but then neither the Divide nor the Blackfoot amendment is modified to take into account the need for security across the entire Elk Herd Unit (NOT just within the HNF Administrative Boundary): "Hillis et al. have recommended at least 30 percent of the fall range in each analysis area, such as a herd unit or larger management area, be maintained as elk security areas if elk vulnerability is to be effectively tempered during the hunting season. Herd units with security above the 30 percent threshold allow for considerably more flexibility in the management of forest vegetation and the road/motor trail network than those that remain below the 30 percent security level." Montana Backcountry Hunters & Anglers contacted two principle authors of the 1991 Hillis Paradigm paper, and requested their response to the Helena's proposal to apply the model to the Helena forest conditions. Below is their response:	

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April 12, 2013 Greg Munther 1295 Lena Lane Missoula, MT 59804 Dear Greg, In response to your request to review the Helena NF's use of the "Hillis Paradigm" (Hillis et al. 1991) for establishing elk road standards, we offer the following information. In the 1980's researchers and biologists from Montana Department of Fish, Wildlife, and Parks were becoming increasingly concerned about accelerated bull elk harvest due to a lack of security (Lonner and Cada 1982). Problems associated with accelerated harvest included a lack of bull carryover (i.e. harvestable bulls were limited to yearlings) and hunters encountered few if any harvestable bulls after opening weekend and eventually quit hunting due to a lack of encounters. Lonner and Cada (ibid.) described such outcomes as losses in hunter opportunity. At the time, portions of western Montana, including the lower Clark Fork and St. Regis drainages, still had substantial bull carryover and a high level of satisfaction among elk hunters. The paradigm was an attempt to characterize those variables in the Lower Clark Fork and other areas with acceptable bull carryover that would provide a minimum level of security for timber and road management planning. The variables selected by the authors included: 1) hiding cover (a minimum of 250 acres in non-linear patches); 2) distance from open roads (a minimum of ½ mile) and; 3) a threshold suggesting that no less than 30% of each herd unit should have this combination of cover and open roads. This combination of variables was selected arbitrarily (i.e. no statistical analyses were done to compare those variables to elk harvest rates), but did involve substantial consideration of on-the-ground conditions for cover, road access and bull elk carryover. Examples of application of the paradigm are limited to the Lolo NF in western Montana. No attempt was made by the authors to consider eastside conditions. Thus we can't say whether or not the paradigm would be applicable to Helena NF conditions. We do suggest, however, that applying the paradigm to eastside forests with typical open forest cover types and gentle topography would be imprudent without first doing some formal review with local biologists and researchers familiar with the unique elk harvest situations on the eastside. A recent paper published by The Wildlife Society (Proffitt et al. 2013) tested GPS collared elk habitat selection during the hunting season against the Hillis paradigm and other attributes and concluded that "female elk selection for areas restricting public hunting access was stronger than selection for security habitat in both study areas, and that the density of roads open to motorized use was the strongest predictor of elk distribution." This suggests that compared to the paradigm there is more up to date science available that the Helena NF should consider. Respectfully, Jack Lyon J. Michael Hillis Amendment Alternative B circumvents the original intent of the Hillis Model by	(39-10)This letter suggests that "…applying the paradigm to eastside forests with typical open forest cover types…would be imprudent without first doing some formal review with local biologists and researchers familiar with the unique harvest situations on the eastside." To that end, the parameters in Alternative B were developed with MFWP and reflect the broader collaborations outlined in MFWP and USDA Forest Service (2013) to which Jack Lyon contributed (See that document, contributors section). (3a) Forest Plan amendment Alternative B includes a discussion of the effects of closed roads on elk security and provides for larger blocks of security. See the section Alternative Description/ Alternative B/Discussion. (3b) Alternative B identifies 'intermittent refuge areas' in addition to security areas. These areas are defined as "those areas at least 250 acres in size and less than 1000 acres in size that are greater than or equal to ½ mile from a motorized route open to the public between 9/1 and 12/1". these areas are probably too small to hold elk securely throughout the hunting

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limiting its application to the Administrative Boundary of the Helena National Forest, and it therefore should not be accepted. 3a. Comment Suggestion: Accept the basic tenants of the Hillis model: i) keep at least 30% of EHU in security (more when bull elk vulnerability is problematic), ii) security areas must be at least ½ mile from an open road, and further when closed roads occur within the security area, iii) forested cover blocks, if they are to serve as security in more open areas must be greater than 250 acres. 3b. Comment Suggestion: Smaller acreage of forested cover can provide important visual screening, travel corridors, and connectivity between actual security blocks. (39-10) Comment 4. The proposed amendment must recognize the open, topographically gentle "east-side" Helena Forest – and develop alternatives that accurately describe the existing landscape and its potential. DEIS Appendix D states: "The 'security area' approach replaces the "road density/hiding cover index" as the Forest Plan standard for gauging the vulnerability of elk to hunting. The amendment derives from the Hillis methodology (1991) and adopts specific guidelines for its application from Recommendations for Big Game Habitat Management on the Custer, Gallatin, Helena, and Lewis and Clark National Forests (MDFWP and USDA Working Group 2013)." Yet, Appendix D of the Divide DEIS does not describe "specific guidelines for its application" as per the MDFWP and USDA Working Group. And most distressingly, the amendment has no intention of meeting even the minimum criteria to provide big game security when it states: "Where security areas comprise 30% or less of that portion of an elk herd unit within the HNF	season; however, they serve as temporary refuges for hunted animals—and in parts of the Divide landscape, they represent the only escape areas available. See the section Alternative Description/ Alternative B/Discussion.

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administrative boundary during the general rifle season, management activities shall not result in a further reduction." The amendment therefore accepts a level of security below the minimum threshold if an EHU is currently below 30%, with no directive to bring it up to minimum levels. In addition, the standard does not prevent EHUs that are above the minimum of 30% from being reduced to the minimum 30% threshold through "actions" by the HNF. Neither of these scenarios is acceptable as a starting point for big game security on the Divide landscape. The Standard as worded in the DEIS is as follows, but no mention is made of hiding cover: STANDARD Implement an aggressive road management program to maintain or improve big game security. This will be accomplished in the Divide Landscape of the Helena National Forest by way of the following: When security areas comprise more than 30% of that portion of an elk herd unit within the HNF administrative boundary, management activities shall not reduce the amount of security areas during the rifle season (approximately October 15 through December 1) to less than 30%. Where security areas comprise 30% or less of that portion of an elk herd unit within the HNF administrative boundary during the general rifle season, management activities shall not result in a further reduction. Definition Security Area – a block of big game habitat, 250 acres or larger, that is generally at least ½ mile from any open motorized route during the rifle big game hunting season (10/15 – 12/1). Hillis et al. (1991) clearly indicates that for forests east of the Continental Divide having more open and gentle terrain, security patch sizes should be enlarged, roadless buffers around cover should be enlarged, and the percentage of the area serving as security should be enlarged. These provisions have not been adequately addressed in the proposed amendment. Language about the proposed amendment simply states (DEIS Glossary-9) that a "Security Area" is "Any area which, because of its geography, topography, and/or	(39-11) See reponse to 4c below.

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vegetation, will hold elk during periods of stress. For this project, a security area is defined as a block of dense forested cover at least 250 acres in size and located at least 1/2 mile from any roads open to motorized traffic during the general hunting season." These criteria are inadequate according to Hillis et al. An analysis of the Hillis Model was conducted for the Bighorn National Forest of northeastern Wyoming10 (39-11). The Bighorn National Forest lies east of the continental divide, and like the Helena National Forest, the terrain is more open with less topographical relief than west-side forests. The Wyoming study clearly indicates that cover is essential to elk survival on the Bighorn National Forest and its findings run counter to the un-validated amendment being proposed for the Helena National Forest: "Research indicates the importance of various aspects of cover to elk survival through hunting seasons. Providing adequate security areas for elk make them harder for hunters to find, therefore, allowing liberal hunting opportunities that are less costly in terms of elk vulnerability. For instance, starting in the mid-1960s, accelerated timber harvesting on the Big Horn Mountains sent former elk hiding cover to the sawmills as logging roads permeated previously secluded areas. With better access and a booming economy, the Bighorn National Forest became deluged with hunters by the mid 1970's. Responding to public concerns about the quality of the hunt, and fewer mature bulls (a symptom of rising elk vulnerability), the WGFD cut elk hunting seasons and switched to limited-quota permits. This resulted in a long-term decrease in elk hunting recreational opportunities. Today, approximately one-third the number of hunters and recreation days found in the 1960's, 70's and 80's remain. The loss of hunting opportunity not only affects hunters; it also means a loss of hunting license revenues for wildlife management programs and loss of income to the state's economy." Wyoming researcher B. Jellison11, in evaluating application of the Hillis Model to the Bighorn National Forest which has open landscapes typical of east-side Montana forests, states: "Rather than imposing more restrictions on hunters (shorter hunting seasons, antler restrictions, limited licenses and technology limitations), one alternative is to maintain habitat security levels that allow desired numbers of bull	

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elk to escape harvest…” “It should be noted that the above guidelines [Hillis Model] were developed for steep, heavily forested habitats of Western Montana. The Big Horn Mountains, with large natural openings and gentle high elevation slopes, provide less security from hunting pressure and other stress induced human activities. Large openings make elk more detectable and gentle slopes provide easier hunter access (Burcham and Jellison 1993). For this reason, we contacted authors of the Hillis paper to get their ideas on security area guidelines for the BNF. Mike Hillis (pers. comm. 1992) recommended applying the model by increasing minimum parameters. He suggested that security area might approximate one mile from open roads and 500 acres in size. Jack Lyon (pers. comm. 1992), Mike Hillis (pers. comm. 1992), and Les Marcum (pers. comm. 1992) all agreed that security guidelines would be most effective if applied to the portions of the Big Horn Mountains where relatively continuous cover exists. Although we initially applied these more restricted parameters suggested by Hillis, the computer model found that few areas met these requirements. Consequently, only the original parameters were mapped and analyzed in this report.” The Bighorn National Forest analysis found that forested cover had been reduced to 24% of its biological potential since pre-forest plan levels of the 1960s. The Bighorn National Forest could not meet the required 30% security for an analysis unit (Wyoming Game and Fish Department, Sheridan Region 2004). Although they did not analyze how hiding cover might be restored, they did note that hunter opportunity on the Bighorn National Forest has plummeted as a result of “accelerated timber harvesting… [that] sent former elk hiding cover to the sawmills and logging roads permeating previously secluded areas” The Wyoming researcher B. Jellison12 determined: “approximately one-third the number of hunters were found as in the 1970s and 1980s. The loss of hunting opportunity not only affects hunters; it also means a loss of hunting license revenues for Wyoming’s wildlife management programs and a loss of income to the	(39-12)See responses to 4a and 4c below.

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state's economy." An analysis of forested cover equivalent to that of the Bighorn NF has not been conducted to determine whether the Hillis Model could even approach functionality for big game security on the HNF. We recommend that this be done.(39-12) Hillis et al. (1991) noted in their concluding statements for their research in western Montana: "Two disturbing trends were discovered. First, most herd units already had less than the minimum 30% security due to past timber harvest; in many of these cases, there were strong indications that bull survival was declining or at risk. Second, even in situations where security was substantially less than 30%, all remaining security stands were targeted for timber harvest. This indicates that timber harvest decisions made over the next few years will potentially severely impact remaining security, and, ultimately, hunter opportunity. Additional research is needed to test and refine these guidelines… Planning must not only address the quality and spatial arrangement of existing security areas, but also must provide for the regeneration of replacement security areas where a sustained timber harvest is desired." We are concerned that the HNF has not addressed the presence/absence of its forests and that omission is camouflaging years and years of serious decline in big game security. Clearly the HNF has struggled to abide by forest plan standard 4a (39-13) The following table taken from a 2011 report, Divide Travel Plan: Background Information for Forest Plan Site-Specific Amendment of Big Game Security Standards, and compared to information provided in the Divide DEIS reveals that methodology to describe hiding cover varies from project to project. Some of the EHUs have apparently increased in hiding cover since 2011 (from 41% to 59% on Spotted Dog) while other have apparently dropped significantly (from 55% to 30% on Greenhorn), and yet others stayed the same (Quartz at 44%). From this information, the public cannot decipher what is going on.	(39-13) See response to 4b below.

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TABLE 1. Hiding cover, weighted open road density, and consistency with Forest Plan big game Standard 4a, by Elk Herd Unit, under current conditions and under the Travel Plan Decision.	

Elk Herd Unit	% Hiding Cover	Open Road Density (mi/mi²)		Meets Forest Plan Standard 4a?	
		Existing Condition	Travel Plan	Existing Condition	Travel Plan
Little Prickly Pear—Ophir	4 5	1.62	1.51	no	no
Greenhorn	30 %	1.76	1.54	no	no
Spotted Dog	41 %	1.51	1.47	no	no
Little Blackfoot	73 %	0.66	0.42	yes	yes
Jericho	62%	1.22	1.14	yes	yes
Black Mtn—Brooklyn	53 %	1.89	1.89	no	no
Quartz	44%	1.07	1.07	no	no
Divide Landscape	48 %	1.48	1.39	-	-

The proposed big game security standard for Divide would start with existing forested spots of 250 acres which are buffered by a distance of at least ½ mile from a road. Where there are areas that are larger than 250 acres, for example 1000 acres, the FS could manage for the minimum of 250 acres, thus cutting the existing 1000 acre block down to only 25% of the original size. In an area seriously lacking security, this would not be acceptable. A new approach is necessary where landscape potential is the basis for management, then where actual security is not meeting a 50% standard, stringent measures should	(39-14)(4a) The Forest Plan amendment includes an analysis potential hiding cover in elk security areas. See the Forest Plan amendment, Potential Elk Security section. (39-14)(4b) The Forest Plan amendment includes a discussion of the hiding cover methodology including reference to tree height and the ability of an area with greater than or equal to 40% canopy cover to hide an elk. See the Forest Plan amendment,

Comments	Response to Comments
be taken to encourage restoration of forest cover and/or reduce road density. 4a. Comment suggestion: HNF undertake a well defined process to quantify, at least on the Divide landscape, the biological/vegetative potential of the Travel Planning Area, as well as the proportion of the landscape that is not meeting that potential. This information is likely already available on the HNF. (39-14) 4b. Comment suggestion: HNF vegetative cover types should be classified as to whether they are capable of providing elk hiding cover at a 40% canopy closure. This metric must be clearly described.(39-15) · Does the 40% canopy closure involve trees that are of at least of a certain height? · Does 40% mean that 40% of the ground is covered at a height of at least 8 feet (the height of a bull elk and his antlers)? · Does the 40% closure account for steep terrain where security is reduced such as a situation in which a person on a road on a side hill can look across the drainage and see down through the canopy cover? · Is there an option for hiding cover on relatively flat ground that could use the Forest Service definition of hiding cover where 90% of an elk at 200 feet is obscured? This might occur in regenerating clearcuts, or even dense tall sagebrush. 4c. Comment suggestion: We recommend an analysis similar to that conducted on the Big Horn National Forest in Wyoming.13 Such an analysis would put to rest the question, "What is the capability of the Helena National Forest to provide big game hiding cover (potential and actual hiding cover in acres)?" The Wyoming report addresses big game security in Strategy 3: "Strategy 3: Detect natural and anthropogenic temporal changes to elk habitats using Landsat TM or similar sensor data every five years. These techniques are proven to be an efficient and cost effective means of gauging federal agency progress towards managing and preserving their elk habitats. The data also facilitates landscape analysis and allows biologists to determine issues and formulate solutions, irrespective of land ownership and accessibility of habitats." (39-16)	Hiding Cover Methodology section. (39-15) (4c) The Forest Plan amendment includes an analysis potential hiding cover in elk security areas. See the Forest Plan amendment, Potential Elk Security section. (39-16) See 4c above. The analysis included in the Forest Plan amendment was completed for all security areas combined for Alternatives 1 (existing condition) and 5 (most aggressive in terms of road closures).

<table>
<tr><th>Comments</th><th>Response to Comments</th></tr>
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As a starting point, fill in the blanks on this table.(39-16)

<table>
<tr><th rowspan="2">MFWP Hunting Districts
OR
Elk Herd Units</th><th colspan="3">Forested Cover</th></tr>
<tr><th>Potential Forested Cover (Acres)</th><th>Actual Forested Cover (Acres)</th><th>Percent of Potential</th></tr>
<tr><td>Blk Mtn/Brooklyn Bridge</td><td></td><td></td><td></td></tr>
<tr><td>Greenhorn</td><td></td><td></td><td></td></tr>
<tr><td>Jericho</td><td></td><td></td><td></td></tr>
<tr><td>L Prickly Pear/Ophir</td><td></td><td></td><td></td></tr>
<tr><td>Quartz Cr</td><td></td><td></td><td></td></tr>
<tr><td>Spotted Dog/LBlkft</td><td></td><td></td><td></td></tr>
<tr><td>Blk Mtn/Brooklyn Bridge</td><td></td><td></td><td></td></tr>
<tr><td>Greenhorn</td><td></td><td></td><td></td></tr>
</table>

4d. Comment Suggestion: The Hillis Model provides important guidelines, and the Wyoming research provides a method to evaluate the status of forested cover on the HNF. It is time that the east-side forests conduct such an analysis (east-side forests as referenced in the DEIS: Lewis and Clark, Custer, Gallatin), on how concepts of Hillis et al., combined with a cover analysis as per the Wyoming design might be beneficially modified to provide big game security on these more gentle, and less densely forested landscapes.(39-17)

5. The EIS has misused the State of Montana's Elk Plan in its use of population data to reflect elk security and thus gives misleading justification for amending Big Game Standard 4a (security).

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(39-17) (4d) The level of analysis that is suggested here (i.e. eastside Forests) is outside the scope of the Forest plan programmatic amendment.

(39-19) The final analysis for the Forest Plan amendment includes a discussion on the correlation between Standard 4a and elk numbers and concludes that there is not a strong correlation between consistency with Standard 4a for a particular EHU and the actual performance of the elk population within the relative Hunting District. We do not make the case that elk population levels are independent of hiding cover but rather that "[c]ompliance, or lack thereof, with Standard 4a is not a good

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Comments	Response to Comments
The DEIS erroneously states that elk population levels are independent of hiding cover because in some areas elk populations are strong even though cover has declined as a result of insect infestations. (39-18) An inverse relationship is likely present between elk populations and hiding cover, wherein a lack of hiding cover leads to displacement of elk to more secure private lands where elk numbers cannot be managed. Concluding that hiding cover is not an issue for elk populations is an erroneous interpretation of security. Bull elk survival reflects security as described by the Montana Elk Plan, not elk population numbers. Bull elk provide the majority of elk hunting opportunity in Montana. Cow elk generally are hunted on a permit basis. When security is inadequate on public lands, acceptable bull:cow ratios (bull populations) cannot be maintained. The Montana Elk Plan (2005) defines minimum bull:cow ratios for each Elk Management Unit. The desired ratios are not being regularly achieved within the Hunting Districts that constitute the six Elk Herd Units within the Divide Travel Area. The DEIS correctly indicates that excessive roads are the leading cause of low bull ratios, but it inappropriately concludes that forest cover is unimportant. The MFWP Elk Plan explains that in hunting districts that have public lands, elk populations can be controlled with antlerless elk permits only if elk security is adequate on public lands. In other words, public lands must be able to "hold" elk via adequate security so they will not be displaced to private, unhuntable private lands. When elk are displaced to private lands, population levels cannot be controlled with hunting seasons. The DEIS wrongly concludes that the current elk numbers which are, at times, above elk population Objectives, are evidence that present elk security is sufficient. In fact, MFWP has documented movement of elk to private lands within the Divide planning area where hunting of elk is extremely limited or not allowed.	indicator of elk population performance given the patterns of land ownership and other factors affecting elk security and/or population levels". See the Forest Plan amendment, Relationship of Forest Plan Standardr 4a and Elk Management/Correlation between Standard 4a and Elk Numbers section.
Due to lack of hiding cover security and excessive road density, displacement of elk from HNF public lands has occurred on all portions of the HNF, resulting in elk displacement to private lands and game damage complaints from private	(39-20)Recent elk data collected by MFWP indicate that three of the four hunting districts are at bull:cow objectives (HDs 215, 335, and 343). The other HD, 293, is below objectives most

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landowners. So, when: 1) security is not adequate on public lands, 2) elk are displaced to private lands, 3) public hunting opportunity is diminished, and then 4) wildlife numbers become unmanageable. Of the four MFWP hunting districts that make up the six EHUs on the Divide landscape, half are below or just barely meeting the minimum bull:cow objectives. The other half are just barely above the minimum objective. This is not a strong testament to security for bull elk. (39-20) So the DEIS is mixing apples and oranges. It does not focus on survival of the bull elk component of the population, which provides the bulk of hunter opportunity, but rather it delves into total elk population issues to assert that because some elk populations are meeting population objectives, the lack of cover is irrelevant. Of course a lack of cover on public lands is very likely why elk numbers are increasing, as large numbers of elk move from insecure habitat to non-hunted private lands. In addition to hiding cover, bull elk survival is correlated with road density. Unsworth et al. (2001) notes that the probability of mortality for a bull elk is 50 percent greater in an area with one mile of road per section than an unroaded area. Two miles of road/section doubles the mortality probability, and athigher road densities bulls usually do not survive the hunting season. Abundantly clear is the fact that the Divide landscape has too many roads: "Total road density in the Divide landscape averages 2.07 mi/mi²; open road density is 1.69 mi/mi²; weighted open road density (calculating arterial and collector routes at 100% of length; local roads at 25% of length) is 0.90 mi/mi²." (DEIS 250) There appears to be a great deal of opportunity to reduce road density on this overly roaded landscape that has 2.07 mi/mi2. This is an amount that more than doubles the probability of mortality for a bull elk.	likely due to predation effects in the northern part of that HD (which is outside of the travel plan area). See the table' MFWP 2005 population objectives and recent trend data in Hunting Districts that Overlap with the Forest' in the Forest Plan amendment and the discussion for HD 293 also in the Forest Plan amendment in the Relationship of Forest Plan Standard 4a and Elk Management/Factors Influencing Elk Management/Hunting District 293 section. (39-21)Discrepancies between the Forestwide Hazardous Tree and Fuel ReductionProject and the Divide EIS are due to better data. In fact, there are differences in data between the Divide DEIS and FEIS because better data have become available. See the Forest Plan amendment, Changes between Draft and Final section.

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The table below takes road density information from both the Divide DEIS and the Hazardous Tree and Fuel Reduction Project. Discrepancies occur in the Spotted Dog EHU for miles of road/square mile when comparing the Divide travel plan DEIS with the Hazard Tree Project EA. (39-21) Table A.Road densities1 for the 8 EHUs in the Divide area 2 and Associated Bull:Cow ratios	

EHU	Mi Rd per Square Mi. Taken from	Miles Open Road during Hunting	MFWP ELK PLAN Bull:Cow Ratio Minimum	Current Bull:Cow Ratio in Hunting Districts associated	% Forest Cover (Haz Tree Table 3.3)/(DEIS-273)/ (Table D2)
Blk Mtn/Brooklyn	1.9/1.89	166.4	10	=/- min. obj.	53/52/52
Greenhorn	1.8/1.76	154.6	10	+/-/= min.	55/56/30
Jericho	1.2/1.22	67.6	10	+/+/-/= min	62/65/65
L Prickly	1.6/1.62	220.2	10	+/=/- min.	45/46/46
Quartz Cr	1.1/1.07	61.7	10	- min. obj.	44/56/45
Spotted	1.2/1.51	111.8	10	+/+/- min	41/59/59

1 Road densities are based on open motorized routes during the big game hunting season. Closed roads and road prisms are not factored in.
2Road mileage taken from Divide travel plan DEIS-250 and from Forest-wide Hazardous Tree Removal and Fuels Reduction Project EA Table 3-16, August 2010.

Table 3.65 says that all the EHUs will meet Criteria for compliance of Divide landscape elk herd units with the amended Forest Plan standard for elk security [using “adjusted” elk security areas]. However Table 3.65 does not reflect the information provided in Table 2.5 of the DEIS which indicates that half of the Hunting Districts that compose the six EHUs do not meet FWP criteria for bull:cow

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ratios. Management implications for forested cover would be relaxed with the proposed amendment to allow more forest cover removal and thus an amended standard could lead to more cover removal or greater road density, to not "place impractical constraints on Forest management and on the ability of the public to use the Forest." The possibility and even likelihood of reducing cover even further if the proposed amendment is implemented would not be in the best interest of bringing bull numbers up to or even slightly above objective. 5a. Comment Suggestion: Acknowledge that bull elk vulnerability on public lands is the basis of defining elk security on public lands. (39-22)	(39-22) (5a) The Forest Plan amendment has been updated to describe bull elk vulnerability. This information is included throughout the amendment; see particularly the following sections: Background/Recent Science regarding Elk Management, Background/The Concept of Elk Security Areas, and Findings Required by Laws, Regulations, and Policies/National Environmental Policy Act/Cumulative Effects of Other Forest Plan Amendments.
5b. Comment Suggestion: A combination of principles regarding security from Hillis et al.14, along with an evaluation of existing and potential forest cover as per Jellison15 should be explored to design and implement an amendment that reflects bull elk security on public lands. (39-23)	(39-23) (5b) See responses to 4a and 4c above
6. To be effective, any big game security standard must be applied for the duration of the hunting season, from September 1 to December 1.	
The archery season extends from the first Saturday in September for approximately 5 weeks generally until one week before the opening of the general rifle season, which occurs in the latter half of October. Archery hunting is becoming more and more popular and comprises a growing percentage of all hunterdays afield. We suspect that when evaluating public lands, the relative number of bow hunters as compared to rifle hunters is even higher. We find application of the proposed big game security amendment to apply only to the general rifle season -- a serious oversight that ignores the displacement impacts by bow hunters. There are about 40,000 licensed bow hunters in Montana and most hunt at least part of the season on public lands, including the Divide Travel Plan area. Grigg16 and others have documented the displacement of elk to private lands due to bow hunting activity. The distribution of bow hunters into the most secure habitats likely exceeds the distribution of rifle hunters because of longer hunting daylight in late summer/early fall, better travel conditions with a general lack of snow, and travel restrictions that	Thank you for your input Please see response(s) below (39-23) (6a) Alternative B in the Forest Plan amendment is designed to reflect this comment. Security in Alternative B is

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are applicable to general rifle season hunters but are not yet applied during bow seasons. 6a. Comment Suggestion: Hunting season dates should be implemented from September 1 to December 1. (39-23)	defined as follows: "a proportion of an elk herd unit within the administrative boundary of the Helena Ranger District that consists of an area of at least 1000 acres in size that is at least ½ mile from a motorized route open to the public between 9/1 and 12/1". See Forest Plan amendment Alternative Description/Alternative B.
7. The cumulative impacts of the proposed Big Game Security amendment upon other Forest Plan Standards have not been adequately evaluated. Indirect and cumulative effects of the proposed Amendment on other forest plan standards were not adequately evaluated. Pursuant to the National Forest Management Act ("NFMA"), the Service must ensure that the proposed amendment (as well as the proposed Divide Travel Plan) is consistent with the Helena Forest Plan. See 16 U.S.C. § 1604 (i). If not, then the responsible official must either change the proposed amendment to bring it into compliance with the other standards in the Forest Plan or amend to the other Forest Plan standards. Appendix B of the DEIS lists various projects that have occurred on the HNF. There is no analysis presented regarding cumulative effects of these projects upon Forest Plan Standard 4a or the proposed Amendment Alternative B. There is no evaluation of the consequences of the proposed Amendment upon other Forest Plan standards.	
By focusing on elk alone, other big game species such as mule deer, white-tailed deer, moose, and bear – are being ignored. A big game standard designed for elk alone is insufficient. Behavioral traits and habitat niche selection – set mule deer and moose apart from elk. 7a. Comment Suggestion: Address the following: How is the big game security standard affecting the other 44 wildlife Standards? (39-24)	(39-24) (7a) The Forest Plan amendment includes the section 'Compatibility of Forest Plan Amendment Alternative B Preferred Alternative with Existing Wildlife Standards'. (39-25) (7b) The wildlife section in Chapter 3 includes a discussion of the value of elk security areas for other wildlife species. See the Wolverine, Northern Rocky Mountain Gray Wolf, and Canada Lynx sections. See also response to 7a.
7b. Comment Suggestion: How are designated big game security areas physically overlapping with other wildlife habitat needs, and what are the effects on other	(39-26) (7c) Alternative B in the Forest Plan amendment includes consideration of 'intermittent refuge areas' to serve as

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wildlife standards? (39-25) 7c. Comment Suggestion: Outside of designated security areas, would there be any constraints on road density, or any requirements for at least minimum retention of forest cover? (39-26) 7d. Comment Suggestion: Define road densities within watershed health criteria. Would adopting the new big game standard encourage more roading? (39-27) 7f. Comment Suggestion: If hiding cover is removed from the standard, then how will minimum levels of forest cover – to adequately screen wildlife movement during the fall to lower elevation habitats – be provided? (39-28) 7g. Comment Suggestion: Divide has the highest densities of roads on the HNF – in many cases twice the acceptable limit of 1.0 miles of road per square mile, that results in at least half of all existing bull elk being harvested. 7h. Comment Suggestion: Explore the likely a correlation between healthy water quality, fisheries health, threatened/endangered/sensitive species presence, bull elk survival, and total elk retention on public lands. (39-29) 8. Cumulative Forest Service actions have lead to a tipping point for big game security across much of the Helena National Forest. Cumulative impacts are "the impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." 40 C.F.R. § 1508.7. Cumulative impacts can result from "individually minor but collectively significant actions taking place over a period of time." Helena Forest Plan IV/2 states, "Within this guidance, projects are developed to most efficiently and effectively accomplish the management goals and objectives.	temporary refuge areas for hunted animals. See the Forest Plan amendment Alternative Description/Alternative B. (39-27) (7d) (Watershed may need to answer some of this). Alternative B in the Forest Plan amendment does not encourage additional roading since the standard will be the numeric value associated with the selected travel plan alternative for each herd unit. In other words, those percentages are fixed with Alternative B. See the Forest Plan amendment Alternative Description/Alternative B. (39-28) (7f) Alternative B includes cover guidelines to adequately screen elk movement during the fall. Additionally, several standards remain in place that govern cover management. See the Forest Plan amendment table 'Forest-wide and Management Area Specific Standards Relevant to Big Game' and Alternative Description/Alternative B. (39-29) (7h) Thank you for your comment.

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All NEPA requirements will be complied with in all projects. This includes appropriate public participation in the development and the results of the analysis done on the projects." (emphasis added) Failure to address HNF actions, through honest cumulative effects analysis, has lead to the erroneous conclusion that big game standard 4(a) has been ineffective. The real problems are road proliferation and vegetative cover that has systematically been depleted largely through repeated "Finding of No Significant Impact" (FONSI), RODs, DNs and other decisions on Forest lands. Cover-loss impacts have accumulated over the 28-year life of the Helena National Forest Plan – a blind eye has been turned to big game security by the HNF for a long time.	
The Divide analysis area is 243 square miles as indicated in the DEIS-62: "The analysis area consists of National Forest System lands in the Divide Travel Management Area. This includes approximately 155,480 acres of public land located in Lewis & Clark and Powell counties. The area encompasses Black Mountain and extends from the Tenmile drainage west to the Little Blackfoot and Bison Mountain area." The percentage of the analysis area capable of producing forested cover is not disclosed in the DEIS, but should be provided. (39-30) Several actions that have occurred on the HNF over the years are not presented in the Cumulative Effects Tables (eg. Sweeney Creek, Bryant Creek), but the information that is presented indicate that through timber sales alone, more than 12,000 acres, or at least 18.75 square miles of forest have been removed since 1990. How much of this has regenerated to hide an elk? Also associated with these sales, at least 7 miles of new road have been constructed, 6 miles of existing road have been widened and straightened, and 5 additional miles have been reconstructed. So, significant percentage of forest cover has been removed since 1990. And now the HNF presses for a new big game security amendment, because the old one is limiting its legal ability to continue removing hiding cover or increase road density.	(39-30)The Forest Plan amendment includes a discussion of existing cover in security areas (See the Forest Plan Amendment Findings Required by Laws…/National Environmental Policy Act/Alternative B/Cover as well as potential cover in security areas (See the Potential Elk Security section).

Comments	Response to Comments
Code language for this seems to be "the standard 4(a) has not proven useful in gauging or guiding management activities under the Forest Plan" and… "impractical constraints on Forest management and on the ability of the public to use the Forest". The upshot is, the Forest Service now contends it cannot meet its own security standard: "Hiding cover has declined to levels that cannot be counterbalanced by any degree of road closures." Collectively, the information in DEIS Appendix B represent only a portion of activities that have occurred on the Helena Ranger District. Not all of the information relevant to evaluating cumulative effects is present, but acreage of forest removal has been substantial. Implementation of these and the other projects, as well as Forest Plan amendments that have not been adequately analyzed in the full context of forest cover loss, demonstrates that the HNF simply has chosen not to abide by the forest plan standard for big game security. The Forest Service knew that these projects would severely affect hiding cover and thus compliance with the Forest Plan security standard 4a. But instead of addressing bull elk vulnerability and antlerless elk displacement to more secure private areas, the HNF erroneously shifts the emphasis to elk populations: "All of the Forest Plan amendments described above with the exception of the Divide Travel Plan Amendment have been or would be site-specific in time and space. None of the past amendments has resulted in significant impacts to elk; nor should the proposed site-specific amendments significantly impact elk. Cumulatively, effects to elk hiding cover from this and other site-specific Forest Plan amendments should not compromise the Forest's ability to provide habitat potential to meet Forest Plan elk population goals." (emphasis added – taken from the Blackfoot big game security Amendment FEIS)(39-31) In the context of amending the big game security standard, the DEIS lists but does not fully reveal the cumulative loss of hiding cover that is currently impacting security. It is important that the pending ROD be based on relevant analytical factors that affect big game security.	(39-31) The Forest Plan amendment has been updated to describe bull elk vulnerability. This information is included throughout the amendment; see particularly the following sections: Background/Recent Science regarding Elk Management, Background/The Concept of Elk Security Areas, and Findings Required by Laws, Regulations, and Policies/National Environmental Policy Act/Cumulative Effects of Other Forest Plan Amendments. More importantly, the Forest Plan included standards to provide big game habitat based on state population goals in place at the time the Forest Plan was crafted (See Forest Plan amendment Background/Relationship of Forest Plan Standard 4a and Elk Management/Forest Plan Elk Population Goals). The analysis in the Forest Plan amendment describes the relationship of Alternative B with those goals and objectives envisioned in 1986. The analysis finds that "[a]mending Standard 4a would not affect the Forest's ability to realize the elk population potential established in the Forest Plan". See the Forest Plan amendment Findings Required by Laws, Regulations, and Policies/National Forest Management Act.

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Where is the analysis across the Divide landscape that describe what proportion of the forest is currently denuded? A discussion of the Divide's habitat potential is not addressed. It is relevant to know whether the HNF compares to the Bighorn National Forest where it was found that forested cover had been reduced to 24% of its biological potential since pre-forest plan levels of the 1960s." In addition to timber sales, fragmentation of critically important Roadless Areas is a concern (Jericho/Black Mountain, Bison Mountain). The HFRA Hazard Tree Project had the following effects: o 136.2 miles of road and 66 different road segments within the Divide landscape were "treated" and routes in two IRAs were improved o IRAs constitute extremely important big game security areas – but the functionality of these areas for security were reduced as a result of the Hazard Tree decision, even though HHAA submitted comments18 and filed an Objection19 requesting that this action not proceed until HNF Forest Travel Planning for Blackfoot and Divide was completed. The HHAA Objection was denied. o The Hazard Tree decision was supposed to be based on Wildland Urban Interface (WUI) maps, and roads within those areas were to have received "treatment". However only 110.2 miles of road occurred in the WUI, and 380.8 miles of road did not. Nevertheless, all 491 miles of road were rubber stamped for "treatment" which involved tree removal along the road extending out 125'-150', and grading and gravelling the surface in many cases. Many dead-end spur roads and road that were closing themselves due to lack of use and vegetation encroachment, were allowed to be reopened – all affecting, or potentially affecting, Forest Plan big game standards 1, 3, 4 (a, b, c, g, h), and 5. o That action allowed treatment (removal of dead and live timber and possible surface improvement) of more than 491 miles of road and created 9,415 acres of disturbance (Hazard Tree EA pg 23) across the HNF – substantially impacting big game summer range hiding cover, fall security, winter thermal cover, and other wildlife requirements. o Compliance with Forest Plan standards for summer hiding cover and big game	(39-32) See responses to 8a and b below.

Comments	Response to Comments
security were exempted from the Hazard Tree project. Forest Plan Amendments Cumulative effects of previous Forest Plan Amendments upon big game security should be fully analyzed to describe the total net reduction in cover across the landscape today compared to hiding cover potential. Examples include the Hazard Tree project and incremental losses that are dismissed as irrelevant even though the EHUs are already below standard. (39-32) · 300' Rule The 300' rule is present in all alternatives. In at least one alternative this provision should have been absent. "Motorized use within 300-feet of open motorized routes is an action that potentially affects all wildlife species and/or their habitat."20 The 300' rule was to have been used judiciously in areas of dispersed camping. It was not to have been applied in a blanket fashion across the Forest. Allowing vehicle travel for dispersed camping for up to 300 feet from a designated travel route will affect a large amount of land thus pushing back security areas from roads, even farther. 300 feet on either side of a road equates to 600 feet of potential vehicle use. This is a significant action for which resource impacts have not been specifically evaluated within the DEIS or considered as part of the alternatives evaluation. Maintenance and enforcement budgets are inadequate to address the current road system, let alone expanded motorized use in a 600' swath along all roads. o The HNF has acknowledged that enforcement of travel plans is difficult and that they do not have the resources to monitor for illegal travel activities. Therefore, this decision alone, to allow a 600' swath of motorized use along roadways will certainly have a significant impact on big game security, hiding cover, vegetation, soil, water resources, and riparian areas. The DEIS does not state how site-specific problems will be addressed once they are discovered. This is an insurmountable problem because road maintenance resources are already woefully lacking21. The HNF itself has severely violated its own Forest Plan Standards and will	(39-33) (8a) The cumulative effects discussion in the Forest Plan amendment includes all those site-specific and programmatic amendments that have been crafted since the inception of the Forest Plan that affect big game. See the Forest Plan amendment, Cumulative Effects sections. (39-34)(8b) See above response (39-35)(8c) Alternative B was developed in response to public comments and includes cover guidelines. See the Forest Plan

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continue to do so unless nondiscretionary Forest Plan Standards and mitigation measures designed to bring the site back into compliance with each standard, are implemented and enforced. 8a. Comment suggestion: Develop a complete list of activities since inception of the Forest Plan for accurate cumulative effects analysis. (39-33) 8b. Comment suggestion: Acknowledge that certain amendments, FONSIs, RODs, DNs, and other decisions have ignored consequences to big game security and hiding cover. (39-34) 8c. Comment suggestion: Recognize that hiding cover must be used to define big game security on public lands. (39-35) 8d. Comment suggestion: Conduct a cover analysis as per Forest Plan Standard 2 with respect to security Alternative B (39-36) 8e. Comment suggestion: Conduct a cover analysis as per Forest Plan Standard 2 with respect to lands occurring between designated "security" areas. (39-37) 8f. Comment suggestion: Attain consistency with the OHV EIS 300' option, by allowing parking for dispersed camping purposes only within 30 feet of a designated system travel route. This rule would not prohibit camping greater distances from roads but would require vehicle parking closer to established roads, thus reducing resource impacts associated with cross-country travel and preventing establishment of numerous new spur roads to dispersed campsites. 9. The Helena National Forest inappropriately proposes a unique amendment for the big game security standard for the Divide Travel Plan area. The Divide Travel Plan area does not seem unique with respect to big game security on the Helena National Forest. The same issue with proliferation of motorized routes, thinner forests, past management that has compromised big game security –	amendment, Alternative Description/Alternative B. (39-36)(8d) A cover analysis has been conducted for both the Forest Plan amendment and the wildlife analysis for the FEIS. See Chapter 3 for the wildlife analysis and the Forest Plan amendment, 'Compatibility of Forest Plan Amendment Alternative B-Preferred Alternative with Existing Wildlife Standards' section and the Findings Required by Laws, Regulations, and Policies/ National Environmental Policy Act/Comparison of Alternatives section. (39-37) (8e) The cover analysis referenced in (8d) includes a cover analysis for each respective herd unit regardless of security area; in other words, this has been completed. See Findings Required by Laws, Regulations, and Policies/ National Environmental Policy Act/Comparison of Alternatives/Alternative A section. (39-38)The Fores Plan amendment applies to those portions of all the elk herd units within the administrative boundary that overlap with the Divide Travel Plan area and includes the herd

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is found Forest-wide. It is inappropriate to propose such an amendment only to a portion of the Forest when similar conditions are present throughout. The Helena Forest Plan was developed for the entire Forest. While there are reasons for geographically specific direction such as unique soils conditions or special designations, we find proposing an Amendment specific to a Travel Plan area unjustified.	units within which the Clancy Unionville project occurred (See Forest Plan amendment Alternative Description/Alternative B section). Because this Forest Plan amendment is programmatic in nature, it would replace Standard 4a for all future management activities.
We are concerned that conflicting procedure and policy decisions emanating from the Divide Travel Planning area will have conflicting consequences upon the Clancy-Unionville portion of the Divide Travel Plan. The proposed amendment would be at variance with the decision that was rendered in 2003 for the Clancy-Unionville travel planning area. That decision came with the clear understanding that existing Forest Plan standards would be applied to this area. Thus a change in a Forest Plan standard after the fact is a connected action that has not been addressed. (39-38)	(39-39)This is outside the scope of the Forest Plan amendment.
Other East-side Forests have similar big game security issues. Therefore we request that this big game amendment process be abandoned in favor of an Eastside Forest process that is more comprehensive and applies proper scientific method and peer-reviewed scientific literature. We suggest a process such as defined in Comment #4 above. (39-39)	(39-40) (9a) The Forest Plan amendment includes an analysis of potential hiding cover in elk security areas in response to a public comment request that an analysis similar to the one conducted in Wyoming be conducted for the Divide Travel Plan. See the Forest Plan amendment, Potential Elk Security section. Also, based on updated data, three of the six herd units in the Travel Plan area currently meet Standard 4a. See the Forest Plan amendment, Changes between Draft and Final section and Findings Required by Laws, Regulations, and Policies/National Environmental Policy Act/Comparison of Alternatives/Alternative A section. Undertaking this effort eastside-wide is outside the scope of the project.
9a. Comment Suggestion: The HNF has quite possibly gone beyond the tipping point of cumulative impacts to hiding cover and security. The Hillis Model provides important guidelines, and the Wyoming research provides a method to evaluate the status of forested cover on the HNF. It is time that the eastside forests conduct such an analysis (east-side forests as referenced in the DEIS: Lewis and Clark, Custer, Gallatin), on how concepts of Hillis et al., combined with a cover analysis as per the Wyoming design might be beneficially modified to provide big game security on these more gentle, and less densely forested landscapes. Restoration actions are likely in order. (39-40)	(39-41) All existing routes not designated as open to motorized travel in the final decision will be considered closed and mapped as such.

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10. Inadequate and unfunded maintenance, monitoring and enforcement of roads/trails and motorized travel as allowed under the Divide Travel Plan, virtually assures that any standard for big game security will not function properly. DEIS says it could take the FS several years to complete the necessary clearances needed to implement the decision. Until then, not all the routes and areas depicted in the ROD would be on the motor vehicle use map. Wherefore, would roads scheduled for closure remain open and on the map till they are closed? (39-41) This would be unacceptable and would not meet the intent of NFMA. Although the DEIS declares that "the existing system continues to be manageable and consistent with EO 11644 and current travel management regulations" (DEIS-7) we question that conclusion. A forest plan amendment should not be implemented simply because the HNF continues to develop roads and forest projects beyond their capacity to meet budgets, meet Forest Plan objectives, or maintain infrastructure, or ensure healthy landscape function. Particularly when National Visitor Use Monitoring figures indicate (DEIS 470): "During fiscal year 2003, 9.0% of Helena National Forest visitors participated in Off highway vehicle (OHV) recreation, 27.3% participated in driving for pleasure, and 2.6% participated in snowmobiling. These percentages are all smaller than the following activities with the highest participation rates, viewing natural features (48%), viewing wildlife (47.5%), hiking walking/hiking (39.5%), relaxing (36.0%), and hunting (30.1%). When visitors were asked to claim a primary activity, 2.4% claimed OHV use, 1.1% claimed driving for pleasure and 0.9% claimed snowmobiling. In general, spending by all HNF visitors was below the average for visitors to all national forests." HNF Forest Plan IV/3: "Monitoring and evaluation comprises the management control system for the Forest Plan. It will provide the decision maker and the public, information on the progress and results of implementing the Forest Plan." In that chapter of the Forest Plan, there is no meaningful reference explaining how	(39-42) The Forest Plan amendment, in response to this comment, includes a monitoring section. See the Forest Plan amendment, Monitoring section.

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big game security Amendment Alternative B will be monitored. Not at all clear is the Helena National Forest's ability or willingness to conduct monitoring and evaluation of big game security. (39-42) 11a. Comment suggestion: Tailor the HNF Divide landscape road system to fit within its road budget. 11b. Comment suggestion: Reduce actions on the Helena National Forest to fit within its budget for Forest Plan monitoring and compliance. 11 c. Comment suggestion: To meet the objectives of the security Amendment Alternative B, select travel plan Alternative 3.	See above comments relative to cumulative effects analyses.
In summary, NEPA (40 CFR 1500-1508) requires: (1) considering a broad range of reasonable alternatives; (2) disclosing cumulative effects; (3) using best scientific information; (4) consideration of long-term and short-term effects; and (5) disclosure of unavoidable adverse effects. As compared to the existing condition, Amendment Alternative B does not constitute a "broad range of reasonable alternatives," nor does it reflect "using best scientific information." The analysis of Alternative B does not accurately "disclose cumulative effects" specifically the thousands and thousands of acres that no longer have forested cover as a result of HNF projects, "consider long-term and shortterm effects" such as permanently affixing security areas to specific polygons, or "unavoidable adverse effects" such as increased landscape fragmentation as a result of identifying permanently fixed security areas, between which intense actions such timber harvest and additional roading could occur.	Additional Note: The Forest Plan amendment has been updated to reflect this comment. See the table 'Elk Security During the Hunting Season (9/1 – 12/1) under Alternative B by Travel Plan Alternative'.
The following table is Table D6. But it shows corrections, clarification, and information additions in red, green, and green, respectively. (editorial note – the table is too big to adequately display here. Please see the project record for this table which occurs on page 26 of the comment letter).	This is referenced in the Forest Plan amendment

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Table D6 is improperly labeled. The 4th column says "% of EHU (within boundary)" but the numbers given are % of EHU in Security. The % of EHU within the administrative boundary is show in brackets {} in column 4. Additional information is shown in green.	This is referenced in the Forest Plan amendment
1 Lyon, L. J., T. N. Lonner, J. P. Weigand, C. L. Marcum, W. D. Edge, J. D. Jones, D. W. McCleery, and L. L. Hicks. 1985. Coordinating elk and timber management: Final report of the Montana cooperative elk-logging study, 1970-1985. Montana Fish, Wildlife, and Parks. Bozeman, MT. 53 pp.	This is referenced in the Forest Plan amendment
2 Lyon, L. J., and J. E. Canfield. 1991. Habitat selection by Rocky Mountain elk under hunting season stress. Pages 99−105 in A. G. Christensen, L. J. Lyon, and T. N. Lonner, editors. Proceedings of the Elk Vulnerability Symposium. Montana State University, Bozeman, Montana, USA.	This is referenced in the Forest Plan amendment
3 Unsworth, J. W., L. Kuck, M. D. Scott, and E. O. Garton. 1993. Elk mortality in the Clearwater drainage of northcentral Idaho. Journal of Wildlife Management 57:495−502.	This is referenced in the Forest Plan amendment
4 Rowland, M. M., M. J. Wisdom, B. K. Johnson, and M. A. Penninger. 2005. Effects of Roads on Elk: Implications for Management in Forested Ecosystems. Pages 42-52 in Wisdom, M. J., technical editor, The Starkey Project: a synthesis of long-term studies of elk and mule deer. Reprinted from the 2004 Transactions of the North American Wildlife and Natural Resources Conference, Alliance Communications Group, Lawrence, Kansas, USA.	This is referenced in the Forest Plan amendment
5 Christensen, A. G., L. J. Lyon, and J. W. Unsworth. 1993. Elk management in the northern region: considerations in forest plan updates or revisions. US Forest Service General Technical Report INT-303. 10 pp	This is referenced in the Forest Plan amendment
6 Ciuti, Simone, Tyler B. Muhly, Dale G. Paton, Allan D. McDevitt, Marco Musiani and Mark S. Boyce. 2012. Human selection of elk behavioural traits in a landscape of fear. Proc. R. Soc. B (2012)279, 4407–4416	

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7 Hillis, J.M., M.J. Thompson, J.E. Canfield, L.J. Lyon, C.L. Marcum, P.M. Dolan, D.W. Cleery. 1991. Defining elk security: The Hillis Paradigm. in Elk Vulnerability - A Symposium. Montana State Univ., Bozeman, April 10-12, 1991.	This is referenced in the Forest Plan amendment
8 Canfield, J.E. 1991. Applying radio telemetry data to timber sale effects analysis in the Harvey Eightmile drainages in west-central Montana. Pages 44-54 in A.G. Christensen, L.J. Lyon, and T.N. Lonner, comps., Proceedings of Elk Vulnerability – A Symposium, Montana State University, Bozeman. 330 pp.	This is referenced in the Forest Plan amendment
9 Hillis et al. (Ibid)	
10 Wyoming Game and Fish Department Sheridan Region Updated May 2004. A ROCKY MOUNTAIN ELK HABITAT CONSERVATION PLAN FOR THE WGFD SHERIDAN REGION (And Portions of the Cody Region) 62 pp.	
11 Jellison, B.A. 1998. Rocky Mountain Elk vulnerability within the Bighorn National Forest. Rocky Mountain Elk Foundation (WY96107), Bow Hunters of Wyoming and Wyoming Game and Fish Department. In A ROCKY MOUNTAIN ELK HABITAT CONSERVATION PLAN FOR THE WGFD SHERIDAN REGION (And Portions of the Cody Region) Wyoming Game and Fish Department Sheridan Region Updated May 2004. 62pp.	This is referenced in the Forest Plan amendment
12 Jellison, B.A. 1998. Ibid.	
13 Wyoming Game and Fish Department 2004. Ibid.	
14 Hillis et al. (Ibid.)	
15 Jellison (Ibid.)	
16 Grigg, J.L. 2007. Gradients of predation risk affect distribution and migration of large herbivore. MS Thesis, Montana State University, Bozeman, Montana. 104 pp.	
17 Moser, Janet S., Denise Pengeroth, Pat Shanley. March 4, 2014. Wildlife Specialist Report/Biological Evaluation for the Blackfoot Nonwinter Travel Plan. Helena National Forest, Lincoln Ranger District, Lincoln, MT. 207 pp.	
18 Helena Hunters and Anglers Association. September 24, 2010. Hazardous Tree	

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Project Summary of Roads to be Treated. 19 Helena Hunters and Anglers Association. April 23, 2010. Objection to Forest-Wide Hazardous Tree Removal and Fuels Reduction Project on the Helena National Forest (Includes Helena Forest Plan Amendment to Forest Plan Standards 3 and 4a 20 Moser et al. (Ibid.) 21 Roads Analysis Report – 2002-2004. Helena National Forest. 112 pp. "Road maintenance funding is not adequate to maintain and sign roads to standard. For the last three years the Forest road budget has averaged about $650,000 a year. The estimated costs to bring the forest's classified roads up to their objective maintenance level standard is about $27.6 million and then it would cost about $2.1 million annually to maintain it there."	
(40) May 19, 2014 Paul G. Justice 3402 Alice Street Helena, MT 59601 May 19, 2014 I am a 77 year old man that rides an ATV with several other retired men on a regular basis through the summer months. As a Helena resident the past 46 years I was an avid bird hunter and hiker that used the very hills and areas under consideration in this study. Unfortunately after knee replacement & several surgeries I can no longer access the hills as I did for years and only the ATV has allowed me to do that. After studying the various alternatives with other riders I feel ALTERNATIVE 2 as the best compromise for a sensible plan that while protecting certain areas it also keeps some well-established routes open for desirable access that are not showing excessive erosion, etc. Therefore I am submitting the following specific	

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observations for your consideration to select ALTERNATIVE 2 CHANGES TO EXISTING CONDITION.	
708-G1 There is a ½ mile section of trail at the north end of section 23 that should stay open as it makes a desirable loop possible. The rest should be closed. (40-1)	(40-1) This is addressed in Alternative 5.
1857-A1 The current existing road in Telegraph Creek is NOT as good as the one being suggested to open. So open it. (40-2)	(40-2) This is addressed in Alternative 5.
527 B1 Closing this road is smart as it is showing extensive erosion. (40-3)	(40-3) Thanks for your comment.
495 D1 This trail should be opened to ATV travel as it does not impact the creek negatively. (40-4)	(40-4 This is addressed in Alternative 5.
314 J1 By opening this road in the Dog Creek area, a very good ATV route will be allowed into the middle fork.(40-5)	(40-5) This is addressed in Alternative 2.
4104 A2 This road in the Bison & Monarch Creek area should be opened to provide a “continuous” route that doesn’t involve back tracking. (40-6)	(40-6) We will consider a connecting route for this area in the decision.
1868 This road in the Kading area is somewhat unsatisfactory but with some work it would be a great way to establish a good continuous ATV route. (40-7)	(40-7)Thank you for the comment; this is addressed in Alternative 2.
MTR001 The trails/road in the Sweeny Creek area should remain open for hiking access only	(40-8) This is addressed in Alternative 5.

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as they are so close to established homes in that area. (40-8) I believe the above suggestions are a compromise that maintains the beauty of our countryside and still allows reasonable access to those of us that can no longer access it any other way.	
(41) May 19, 2014 I support the non motorized prescription in Alternative 3 and maintain the following areas as Non-Motorized year-round. Drew Martin 500 Lake Ave. #102 Lake Worth, Fl. 33460	(41-1) Thank you for your input
(42) May 22, 2014 Heather, First a little background for you; I started hunting and recreating in the Little Blackfoot area in 1961, and still do today. I have seen a lot of changes and must say I think you are on the right track with your Divide Travel Plan. I found a lot of inaccuracies trying to read thru your Divide Bible. I would hope that someone would check all alternatives or at least the one you decide on for accurate data. Again, I must keep my comments to the area I use and understand. Of the four alternatives I would be happy with either alternate #3 or alternate #4 with some suggestions: •The proposal to close MTR-502, MTR-503, MTR-504 and 227-E1, I completely agree with. MTR-503, it is a user created route and definitely should be closed. MTR-502 is a route that undoubtedly should be closed, due to the hazardous trail and erosion factor. It leads to a road that goes in and out of the proposed Electric Peak Wilderness and the Beaverhead/Deerlodge travel plan that only allows over the snow travel after December 2nd. (42-1)	(42-1) Preferred alternative reflects these suggestions.

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•MTR-504 goes through a wet riparian area that has been used for a mud bog area and is heavily damaged. This should be closed also. (42-2)	(42-2) This is addressed in Alternative 5.
•MTR-501, I understand was marked wrong on the new map. I am not sure what it is supposed to be, but, I would like to see it opened to wheeled vehicles 50" and under from May 15th. to Sept 18t. This is the only access from Little Blackfoot River Road into the Spotted Dog area, and back to Avon or Elliston. Again, the only route that a 2 track will be allowed on would be on MTR-501. At the top of the hill MTR-501 would intersect with #314 and #1870 which are open to wheeled vehicles 50" or under from May 15th. To Sept. 1st. and should remain so.(42-3)	(42-3) Preferred alternative reflects these suggestions.
•The Forest Service gate on Spotted Dog #314 and at the pillars on #1870, in the past were signed and closed on Sept 1st. for wildlife protection, before archery season opens. This should remain the same. Then the gate off of the Little Blackfoot River Road should also be signed and closed Sept. 1st. again, for wildlife protection, before archery season opens. (42-4)	(42-4) Preferred alternative reflects these suggestions.
•For some reason MTR-501 is not even listed in appendix E of the Divide Bible.	
•#227-E1 is another example of a road that is traveled a lot in wet conditions, and it doesn't go anywhere. The heavy travel in and out in wet conditions creates a lot of sediment that flows into the Little Blackfoot. This route should be closed at the turn around area.	
•The roads #4104-A1 and #4104-Al as marked on alternative #4 are a good example of a proposal carried forward to have wheeled vehicles 50" and under travel from the Little Blackfoot River road, through an area that was closed. This will connect into the Ontario/Telegraph /Rimini area. This is also a good choice. By opening #4104-A1 and MTR-501 this will open long loop routes with access from Rimini-Basin to Avon-Elliston.	
•There are a lot of short, dead-end roads for both ATV and over the snow vehicles, which should be closed. They don't go anywhere and create an opportunity for someone to travel where they are not legal.(42-6)	
•There are some others that need some attention: # 227-Al is gated with no access, except for foot or horseback. It also enters section 35 which belongs to FWP/Spotted Dog WMA which is a non-motorized area. #227-Cl only accesses private property and is not open to the public. #227-Dl the bridge is out and there should be no	

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access for motorized allowed year round.(42-7) •I do have concerns for how, any and all changes will be signed and enforced. Proper signage is essential to help stop unauthorized travel. (42-8) •On the Spotted Dog Wildlife Management Area, FWP installed pylons indicating roads that were closed. This has worked extremely well. (42-9) •The 300' rule also needs to be looked at closely. For some it allows people to drive 300 feet off the main road just because they can. I personally would like to see this 300' rule eliminated. I think you could have access to an existing camp site but not to create a new one. Again signage would help this. (42-10) This is an extremely tough decision and you can't please everyone. The resources should have first priority. Good Luck Neil M. Horne 419 Mill Road Helena, Mt. 59602 Phone= 406-431-0130	(42-5) This is addressed in Alternative 5. The Hydrology Specialist Report analyzes the effect of each alternative on roads that are hydraulically connected to streams and have the potential to deliver sediment. Appendix E in the Final EIS provides route-by-route information with the proposed designation for each alternative. Road 227-E1 would be closed in Alternative 5. (42-6) Thank you for your input (42-7) Thank you for your comment, these are addressed in Alternative 5. (42-8) Thank you for your comment. (42-9) Thank you for your comment. (42-10) This is addressed in alternative 5.
(43) May 23, 2014 Attached are my comments on the Divide Travel Plan. Thanks for the extended comment period as this is the first time I had heard about this plan. Brian McCarty DEIS comments - I do not recreate or hunt in these areas but I generally don't agree	

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with any road closures. That being said, I believe that Alt 2 is a livable compromise. I believe that the FS could do well in most travel plans by adding a few miles of trails/roads that would connect some trails to create circuitous routes so that trail riders don't have to leave by the same route they came into an area. I think riders would be more open to trail closures if they had more of these type routes. (43-1) Amendment comments - I don't know the country at all so I can't really pick any of the plans but I would just comment that I have no problem with closing some trails during hunting season and/or calving season if needed. Access to an area is important but road hunting is definitely not a necessity.	(43-1)The preferred alternative was designed around the concept of providing loop opportunities.
(44) May 25, 2014 We have assembled the following information and issues from our members and other motorized recreationists for the project record. We appreciate the opportunity to provide our comments for the Divide Travel Plan. We enjoy riding our OHVs on primitive trails and roads in the Helena National Forest. All multiple-use land managed by the Forest Service provides a significant source of these OHV recreational opportunities. We are looking forward to working towards a more reasonable travel management plan for the Divide Travel Management Project Area. We would welcome you to meet and work with our members on the Divide Travel Plan at any of our meetings. We would also invite you to join us on OHV rides to review and work on routes in the project area. Thank you for your consideration of our comments. Sincerely, /s/ Action Committee on behalf of our 136 members and their families Capital Trail Vehicle Association (CTVA) [1] P.O. Box 5295 Helena, MT 59604 -5295 CTVA_Action@q.com	

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Contacts: Don Gordon at (406) 458-9577 DGordon315@aol.com Ken Salo at (406) 443-5559 ksalo245@msn.com George Wirt at (406) 227-6037 G_wirt@msn.com CC: Dave Koch. President CTVA [1] CTVA is also a member of Montana Trail Vehicle Riders Association (mtvra.com), Blue Ribbon Coalition (sharetrails.org), and New Mexico Off highway Vehicle Alliance (nmohva.org). Individual memberships in the American Motorcycle Association (ama-cycle.org), Citizens for Balanced Use (citizensforbalanceduse.com), Families for Outdoor Recreation (ffor.org), Montana 4X4 Association, Inc. (m4x4a.org), Montana Multiple Use Association (montanamua.org), Snowmobile Alliance of Western States (snowmobile-alliance.org), Treasure State Alliance, and United Four Wheel Drive Association (ufwda.org) May 23, 2014 Helena National Forest ATTN: Divide Travel Plan 2880 Skyway Drive Helena, MT 59602 comments-northern-helena-helena@fs.fed.us Re: Comments for the Divide Travel Plan Dear Sir/Madam, We have assembled the following information and issues from our members and other motorized recreationists for the project record. We appreciate the opportunity to provide our comments for the Divide Travel Plan. We enjoy riding our OHVs on primitive trails and roads in the Helena National Forest. All multiple-use land managed by the Forest Service provides a significant source of these OHV recreational opportunities. We are passionate about OHV recreation for the	

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following reasons: Enjoyment and Rewards of OHV Recreation • Opportunity for a recreational experience for all types of people. • Opportunity to strengthen family relationships. • Opportunity to experience and respect the natural environment. • Opportunity to participate in a healthy and enjoyable sport. • Opportunity to experience a variety of opportunities and challenges. • Camaraderie and exchange of experiences. • For the adventure of it. Acknowledged Responsibilities of Motorized Visitors • Responsibility to respect and preserve the natural environment. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment. • Responsibility to respect all visitors. • Responsibility to use vehicles in a proper manner and in designated places. • Responsibility to work with land, resource, and recreation managers. We are committed to resolving issues through problem solving and not closures. • Responsibility to educate the public on the responsible use of motorized vehicles on public lands. We feel that we are representative of the needs of the majority of visitors who recreate on public lands but may not be organized with a collective voice to comment on their needs during the public input process. These independent multiple-use recreationists include visitors who use motorized routes for family outings and camping trips, weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching, rock climbing, skiing, camping, hunting, RVs, shooting targets, timber harvesting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks, etc. Mountain bikers seem to prefer OHV trails because we clear and maintain them and they have a desirable surface for biking. Multiple-use visitors also include physically challenged visitors including the elderly and veterans who must use wheeled vehicles to visit public lands. All of these multiple-use visitors use roads	

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and motorized trails for their recreational purposes and the decision must take into account motorized designations serve many recreation activities, not just recreational trail riding. We have observed that 97% of the visitors to this area are there to enjoy motorized access and motorized recreation. A Pro-Recreation alternative is viable and needed by the public. The reasons and issues presented by motorized recreationists including these comments are adequate justification to develop and support a Pro-Recreation alternative. Other motorized recreationists are available to develop and support a Pro-Recreation alternative if the agency would engage them. Again, we urge the Forest Service to address this situation and restore public confidence in the agency by developing and selecting a Pro-Recreation alternative that provides equal program delivery by converting roads to OHV trails and allocating at least 50% of the trails to motorized use. (44-1) We are looking forward to working towards a more reasonable travel management plan for the Divide Travel Management Project Area. We would welcome you to meet and work with our members on the Divide Travel Plan at any of our meetings. We would also invite you to join us on OHV rides to review and work on routes in the project area. Thank you for your consideration of our concerns and requests. Sincerely, /s/ Action Committee on behalf of our 136 members and their families Capital Trail Vehicle Association (CTVA)1 P.O. Box 5295 Helena, MT 59604-5295 CTVA_Action@q.com Information and Issues That Support A Pro Motorized Recreation Alternative May 25, 2014 1. The 3-State OHV Record of Decision requires site specific analysis before any	(44-1)Resource management is a blend of Social economic/political needs balanced with biological/ environmental needs. The preferred alternative we feel reaches this sensitive balance and provides for the public needs as it is providing for environmental concerns.. (44-2)The status of the grizzly bear and grizzly bear habitat in the Divide landscape, the nature of populations and habitat in neighboring areas, and the relative effects of Travel Plan alternatives on grizzlies are presented in the Wildlife Background Report (p. 81-89, 184-192) and in equivalent sections in the EIS. (44-3)As discussed in these narratives, the management direction for open road densities and non-motorized core areas that apply to the Northern Continental Divide Ecosystem (NCDE) and Greater Yellowstone Ecosystem (GYE) Grizzly Bear Recovery Zones do not apply to the Divide landscape. This landscape is classified as a “Grizzly Bear Distribution Area”—an area inhabited by a small number of bears that have dispersed out of

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motorized opportunity can be closed. There is no proof that the grizzly bear is impacted. A five year study must be done in the Divide Travel Planning area to clearly demonstrate significant impact using a sense of magnitude as defined in our objection. We would like to be partners in the study and cosponsor a grant to fund it. (44-2) 2. We support reasonable protections for wildlife when real negative impacts to wildlife are clearly demonstrated and when actions such as seasonal motorized closures for elk calving are shown to have a reasonable magnitude of positive benefit. FWP has not provided any documentation that clearly demonstrates the impact of OHV recreation on grizzly bears. We have not heard of a bear being killed, maimed, or otherwise harmed by an ATV or motorcycle. FWP has been wanting to close roads and trails for years in the name of grizzly habitat and it is still grizzly habitat. This is clearly demonstrated in the Swan Valley study referenced below. Additionally, FWP and other agencies clearly disturb grizzly bears more than OHV recreationists with their annual capturing, tagging, and collaring for study programs described in the following news release http://archive.greatfallstribune.com/article/20140522/LIFESTYLE05/305220008/Biologists-beginseasonal-grizzly-bear-capturing-research-management-Montana. (44-3) 3. Research has found that grizzly bears in the greater Yellowstone ecosystem have a varied diet and are minimally affected by the decline in the number of whitebark pine trees, federal research found. The findings were presented Thursday in Bozeman at a meeting of the Yellowstone Ecosystem Subcommittee of the Interagency Grizzly Bear Committee. The subcommittee voted 10-4 to accept the research findings. It also gave preliminary approval to a motion that recommends the U.S. Fish and Wildlife Service remove federal protections for the bears, currently listed as “threatened.” Grizzly bears are minimally affected by the supply of pine nuts and the federal protections grizzlies are in the process of being removed. Therefore, grizzly bears should not be used to close motorized routes and opportunities.	neighboring Recovery Zones—in this case, the NCDE. Wildlife management and travel management in the Distribution Zone are not driven primarily by the need to accommodate grizzly bears. The pattern of road density and non-motorized security areas is shaped primarily by elk and other hunted big game species. The availability of these unroaded enclaves and the location of roads away from productive habitat sites (primarily riparian and wetland areas) benefits grizzlies, wolverines, lynx, and a variety of other species averse to human presence. But the main driver of the system is elk security and habitat effectiveness [Wildlife Background Report (p. 47-77, 157-183)]. (44-4) In the case of grizzly bears, the non-motorized areas are designed not so much as a buffer against human-caused mortality as they are undisturbed areas of suitable habitat large enough to allow the small local population of bears to make a living. We expect that, while the local population in the Travel Plan Area will increase somewhat in the future as bears migrate in from the Recovery Zone to the north, it will remain small. The bears are territorial and there is only so much suitable habitat. Grizzlies will be accommodated, but the area will not be managed primarily as a grizzly bear refuge, as are the Recovery Zones.

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http://billingsgazette.com/news/state-and-regional/montana/research-grizzlies-not-sodependent-on-pine-nuts/article_c2f5c901-65ad-5d5a-a975-f40864cbc563.html(44-4) 4. The grizzly bear will be delisted in two years or less. More motorized closures in the name of grizzly bear protection are not warranted at this time. http://mtstandard.com/news/state-and-regional/montana-feds-mull-repeal-of-grizzlyprotections/article_c8ab2322-3597-56f2-b543-31004495a45d.html http://helenair.com/news/local/fwp-chief-says-grizzly-delisting-nearing/article_f007e220-dcc5-11e3-a9ea-0019bb2963f4.html 5. The actual zone of influence of motorized trails on wildlife is very small as demonstrated in a later comment. 6. The Northern Continental Divide Ecosystem (NCDE), outside of Glacier National Park, has grizzly bear population densities of about 1 bear per 20-30 square miles and has human recreation consisting of motorized access, motorized recreation, hiking, fishing, camping, horseback riding, and big game hunting. Glacier National Park annually receives approximately 2-3 million visitors, does not allow hunting, and has grizzly bear population densities estimated at about 1 bear per 8 square miles. The Yellowstone Ecosystem (YE) which is comprised of Yellowstone Park and surrounding National Forests, receives more visitation than Glacier Park and has an increasing grizzly bear population estimated at 1 bear per 30-50 square miles (http://www.r6.fws.gov/endspp/grizzly/bittereis/deischp2.htm). All indications are that grizzly bear habitat is fully occupied and that additional road closures and obliteration will not produce any more bears and, therefore, motorized closures are not reasonable or productive. Further evidence of this condition is the fact that grizzly bears are moving out onto the prairies around Valier and Choteau. Therefore, grizzly bears can coexist at reasonable population densities with multiple-use recreation and there is no compelling reason to close roads and trails to motorized recreationists to increase grizzly populations because the most significant constraint is their need for so many acres between other grizzly bears. (44-5) 7. Kate Kendall's Greater Glacier Bear DNA study (includes all the North Fork of	(44-5)As discussed in the Wildlife Background Report (p. 86-89, 184-190) and equivalent sections of the FEIS, the Divide landscape, under any of the 5 Travel Plan alternatives, maintains a considerably higher open route density and a much smaller array of unroaded “core areas” than does the NCDE Recovery zone referenced here. Grizzlies can successfully inhabit the Divide landscape, in spite of this more ubiquitous human presence, but their populations will be much smaller than in the Recovery Zone and they will require a few large areas where human activity is minimal. (44-6) Population goals and grizzly bear numbers in the NCDE are not relevant to management of grizzlies in the Divide Travel Plan Area (other than the indirect effect of increasing populations in the NCDE driving the export of bears toward the Divide landscape). ESA delisting is beyond the scope of the Divide Travel Plan.

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Flathead), which identified 367 unique individual bears with one year's data not yet analyzed. The recovered population target was 600 bears for the entire Northern Continental Divide Ecosystem, so there is already known that about 2/3 of that target exist on about 1/4 of the habitat. Completion of DNA study of the rest of the ecosystem is certain to show that bear populations far exceed the recovery goal and should be de-listed. The study was released in December 2006 and indeed did confirm that there was more than 545 bears in the ecosystem (http://www.greatfallstribune.com/apps/pbcs.dll/article?AID=2006612240302). Furthermore, a study released in September 2008 found that there were at least 765 grizzly bears (http://www.helenair.com/articles/2008/09/17/top/55st_080917_grizzlies.txt. It is clear that the grizzly bear populations are healthy and that motorized recreationists should no longer be shut out of grizzly bear habitat. (44-6) 8. Grizzly bears in the Yellowstone region were delisted in 2007 and then forced back onto the list by the courts in 2009. 9. A Grizzly Bear study in the Swan Valley of Montana found that 99 percent of the bears spent 99 percent of their time on Plum Creek property as shown in the following aerial photograph. This property has been heavily logged resulting in undergrowth plant species that support bears. Thick and overgrown timber does not allow for adequate undergrowth. As we now see by this study, critical bear habitat is quite different than what was once assumed and this new information must be incorporated into this evaluation. The Forest Service should discard the original "road density guidelines" and develop new guidelines that reflect the habitat most critical for bears as one that is timber harvested and roaded. Old outdated science formulated by assumptions should not be used when true science and actual data is now available. (44-7)	(44-7)The Wildlife Background Report (p. 81) discusses the grizzly bear's preference for a landscape with a diversity of habitat formations, including open meadows, grassland, mature conifer forest, early seral forest, aspen, riparian areas, and shrub associations, among others. This diversity would be unaffected by Divide Travel Plan alternatives. What is affected is how much of this suitable habitat would be rendered unavailable or less available by the presence of open roads and motor trails (Wildlife Background Report, p. 82-83, 184-187).

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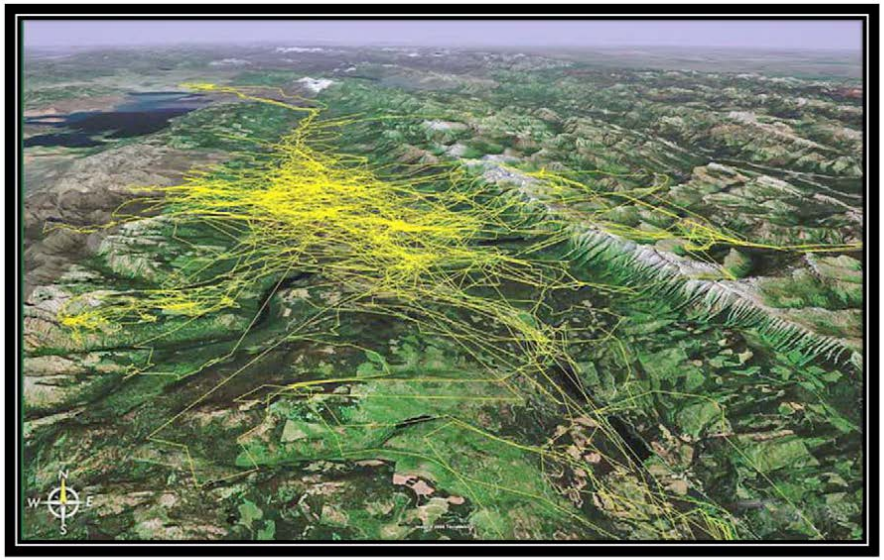 Figure 1. Grizzly bear movements based upon GPS collar telemetry studies conducted by Waller (2005) in the Swan Valley of northwest Montana (from a July 19, 2005 presentation by USFWS Grizzly Bear Recovery Coordinator Chris Servheen in Kalispell, MT).	(44-8)Thank you for your comment. This is beyond the scope of the Divide Travel Plan.
10. A December 31, 2003 Federal Court ruling found that associated with actions taken under the endangered species action must be paid to the public. The case stemmed from the government's efforts to protect endangered winter-run chinook salmon and threatened delta smelt between 1992 and 1994 by withholding billions of gallons from farmers in California's Kern and Tulare counties. Court of Federal Claims Senior Judge John Wiese ruled that the government's halting of water constituted a ``taking" or intrusion on the farmers' private property rights. The Fifth Amendment to the Constitution prohibits the government from taking private property without fair payment. ``What the court found is that the government is certainly free to protect the fish under the Endangered Species Act, but it must pay for the water that it takes to do so," said Roger J. Marzulla, the attorney representing the water districts that brought	(44-9)By this logic, the increase in motorized use of trails represents a loss of quiet, non-motorized recreation opportunity for hikers and others who go out on the Forest expecting an environment free from the mechanized chaos of much of the rest of the world they live in. These people would thus need to be compensated for the loss they suffer from mechanized recreation. Efforts to provide non-motorized habitat opportunity for grizzly bears represent a positive step for these recreationists. (44-10)Delisting is expected sometime in the future. But given erratic history of such efforts in the past and the uncertainty of the future timeline, delisting does not fit within the definition of

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the claim. (44-8) This same standard should also be applied to the economic and motorized recreational losses that the public has suffered under the ESA including motorized closures justified by grizzly bear habitat and impacts on westslope cutthroat trout and bull trout. (44-9)(http://www.uswaternews.com/archives/arcrights/4caliwate2.html) 11. The current analysis does not adequately consider grizzly bear delisting under the Reasonably Foreseeable actions. This action is imminent. At the same time there is so much emphasis on the management of the area and region as a non-motorized area for grizzly bears. First, we do not feel that OHV recreation has a significant effect on grizzly bears and, secondly, the analysis must be based on the impending delisting of grizzly bears. Other pended delisting of endangered species must also be considered.(44-10) 12. "Present day populations of white-tailed deer and elk are at their highest levels recorded in recent history" (Montana Wolf Conservation and Management Planning Document, Montana Fish, Wildlife and Parks, January 2000 (http://www.fwp.state.mt.us/wildthings/wolf/wolfmanagement011602.pdf). Additionally, "nearly 60 percent of Montana's original elk management units exceed elk-population objectives, while only 31 percent exceed harvest objectives" (www.fwp.state.mt.us/hunting/elkplan.html). 13. The number of hunters is declining (U.S. Fish and Wildlife Service, 1996 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. http://library.fws.gov/nat_survey 1996.pdf and http://www.cbsnews.com/stories/2007/09/03/national/printable3228893.shtml). Therefore, there are no compelling reasons "to elevate the level of elk security in the project area and…enhance elk populations" as frequently suggested by wildlife biologists (example; Fish, Wildlife and Parks letter dated February 27, 2002 to Helena National Forest on the Clancy-Unionville Travel Planning Project, bottom of page 9). Additionally, there are no compelling reasons to justify reduced road	"reasonably foreseeable" as used in NEPA. In any case, delisting would not significantly alter the way the Helena NF manages grizzly bears in the Divide landscape. The Helena NF will continue to manage the Divide landscape to provide adequate habitat and protection for big game animals, forest carnivores, and other species that require unroaded country regardless of whether any of them are listed under the Endangered Species Act. Management is driven primarily by the habitat requirements of these species as best we can determine from the latest science. It is unlikely that the Forest will substantially alter its approach to grizzly bear management in the Divide landscape if the Grizzly is delisted. The bears will still be there and they will require the same kind of habitat. (44-11) NEPA requires that an array of reasonable alternatives be considered. It does not expect that they will all be implemented.

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densities as a sought-after or necessary wildlife management criterion. Lastly, there are reasonable alternatives including permit hunting and seasonal travel restrictions that can better accomplish the outcome sought by reduced road and trail densities. NEPA requires consideration and implementation of all reasonable alternatives. Not considering and implementing reasonable alternatives demonstrates a predisposition in the process. (44-11) 14. Elk Cover Requirements. Elk do well in places like Nevada without trees. Additionally, elk were originally a plains animal and survived just fine without trees. Effective elk hiding is provided by mountains, hills, ravines, ridges, rocks, brush. These land factors must be incorporated into the elk hiding cover equation. Recent analysis by the Helena National Forest for the Elkhorn Wildlife Management Area has demonstrated that a reasonable consideration of the topography in the area would meet the requirements for elk security. This reasonable and realistic approach to elk cover and wildlife security requirements was not applied to the Divide Travel Planning analysis.	(44-12) Wolves have altered elk behavior in areas where they are regularly resident and abundant—as in Yellowstone and, more recently, in the upper Blackfoot country. Wolf packs have been present to one degree or another in and around the Divide landscape since 1995. But they have never been enough of a presence to alter elk behavior patterns, and given the juxtaposition of Forest and private ranchland in the landscape, it is highly unlikely that they will ever do so. See Wildlife Background Report "Northern Rocky Mountain Gray Wolf" (p. 104-112, 209-214) and equivalent sections in the EIS.
15. Additionally, wolves have radically changed elk behavior and use of tree canopy. Elk now avoid tree cover because the cover allows wolves to prey upon them easier. Elk now prefer open areas where they can "keep an eye" on the wolves and defend themselves. Therefore, tree cover is not a significant benefit to elk at this time and this changed condition must be recognized. (44-12)	(44-13) Thank you for your comment. This is beyond the scope of the Divide Travel Plan.
16. While Revised Statute 2477 was repealed by the 1976 National Forest Management Act, the revision clearly stated in the Act was to insure that no new roads from the effective date of the Act would be considered for RS 2477 consideration. It further clarified the historical highways would be honored. That is all that the 1976 Act modified or repealed. Until the federal government completely repeals the 1866 Act, (Revised by the 1872 Act) in its entirety the citizens of the United States still have the right to access lands for the benefit of the people of the United States. The decision rendered by the 10th circuit re-affirms this (http://www.kscourts.org/ca10/datefile/datefile.htm look under 9-8-2005, and then	

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04-4071 -Southern Utah Wilderness Alliance v. Bureau of Land Management). The court has ruled that the rights exercised by the counties would be valid if the routes in question were indeed 2477 classified. The county has records that show that the routes were there prior to the establishment of the 1976 NFMA and FLPMA and, are therefore, valid RS 2477 routes. Additionally, it is the responsibility of the agency proposing a closure action to adequately research those records and establish which routes meet RS 2477 classification and then consult and coordinate with the County with respect to that classification. The Divide Travel Plan project area includes many important RS 2477 routes that were established by miners, loggers, and early settlers. We request that this project include adequate research of the county records and adequate formal consultation and coordination with the county to identify RS 2477 routes and include them as historic motorized routes. (44-13) 17. The most equitable management of public lands is for multiple-uses. Congress recognized this need with many laws including the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528 et seq.) and National Forest Management Act of 1976. Multiple-Use was defined as "The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people..." Outdoor recreation is the first stated purpose of the act. Note that the pre-Columbian management scheme has not been enacted by Congress. Therefore, the Forest Service has a responsibility to provide recreational opportunities that meet the needs of the public just as government entities provide road, water and wastewater systems that meet the needs of the public. Public Law 88-657 states that "the Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the national forests and other lands administered by the Forest Service is essential if increasing demands for timber, recreation, and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture	

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(hereinafter called the Secretary) to provide for intensive use, protection, development, and management of these lands under principles of multiple use and sustained yield of products and services.”. The Federal Land Policy and Management Act of 1976 (FLPMA) states that “(7) goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law; and, (c) In the development and revision of land use plans, the Secretary shall -- (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law;”. Multiple-use management goals are the only goals that will “best meet the needs” of the public and provide for equal program delivery to all citizens including motorized visitors. All of visitors have a responsibility to accept and promote diversity of recreation on public lands. Diversity of recreation opportunities can only be accomplished through management for multiple-uses and reasonable coexistence among visitors. Multiple-use lands must be managed for shared-use versus segregated-use or exclusive-use. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964. A significant closing of roads and motorized trails in the project area is not consistent with meeting the needs of the public and the goals of Multiple-Use Management as directed under Federal Land Policy and Management Act of 1976 (FLPMA), Multiple Use Sustained Yield Act of 1960 and P.L. 88-657. Legally designated multiple-use lands must not be managed for limited-use instead of multiple-use. This is a significant issue and must be adequately addressed. We request full compliance with multiple-use policies and laws and the development of a Pro-Recreation preferred alternative that will support these policies and laws and the needs of the public. 18. A program similar to the following is needed to help the agency better understand the needs of motorized single-track trail riders which have been ignored	(44-14)Thank you for your input.

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in the analysis.(44-14) Single Track Summit - AZ State Park OHV Program Arizona State Parks Off-Highway Vehicle Program is excited to host this first ever event focused on bringing riders and land managers together to understand the unique trail requirements of motorcycle riders, building partnerships between rider groups and agencies, developing project proposals, and how to pay for all this work using YOUR OHV Fund. Everyone should leave this event with knowledge and contacts to help develop single track opportunities statewide. Please join us for what will prove to be a productive day with just enough fun stuff sprinkled in to make it exciting. We have a video short on single track riding, GoPro footage of local technical riding, and will screen the recently released adventure riding film about the Arizona Backcountry Discovery Route. Plus we will have some motorcycles on display that are used for single track riding and adventure touring. SINGLE TRACK SUMMIT SCHEDULE OF EVENTS Saturday 8:00am - 9:00am: Continental Breakfast and check-in 9:00am: Summit Kickoff & Morning Presentations noon - Lunch and screening of the Arizona Backcountry Discovery Route 1pm Afternoon Presentations & Meet the Land Managers 4pm Summit Wrap Up Presenters Coconino National Forest & Coconino Trail Riders - The Kelly Canyon Experience Trail Riders of Arizona - Developing Partnerships Bureau of Land Management - Project Design and Long Distance Connections Arizona State Parks - Making it Rain, Project Funding Mechanisms and Doing Business with the State Tonto Recreation Alliance - Keys to Being a Good Partner Surprise Guests	(44-15)Thank you for your input

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Sunday (optional) Trail Ride - Location to be determined, bring your own motorcycle (44-15) 19. Public understanding of the proposed alternatives would be greatly improved by implementing a mapping tool similar to the one developed by Idaho Parks and Recreation. This tool can be tried out at http://www.trails.idaho.gov/trails/. Zoom in and click on a particular trail to see the information provided for each route. Earlier versions of this tool included GPS downloads for each route which would help assure that the public was on the right trail. This tool would also be useful after the analysis and decision to inform the public of the route designations. 20. NEPA law requires adequate public disclosure including adequate public involvement, and discussion of potential impacts in the environmental document. NEPA and CEQ guidance includes CEQ Sec. 1500.1 Purpose. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail. It shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment. Agencies shall focus on significant environmental issues and alternatives and shall reduce paperwork and the accumulation of extraneous background data. Statements shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses. In order to adequately meet disclosure requirements the environmental document must include an accurate estimate of the magnitude of the benefit to the natural environmental versus an accurate magnitude of the impact including dollars, measures of recreation time and benefit on the human environment. For example, the public needs to know that a salmon run can be increased by 1,000 fish but at an annual loss in energy production of $10,000,000 for a cost $10,000 per fish. Another example would be the closure of 50 miles of OHV routes so that 2 lynx are not minimally disturbed resulting in the loss of 5,000 person days of recreation at a value of $150 per day for a cost of $750,000 per year.	

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An adequate sense of magnitude must be employed in the impact determinations. This information must be disclosed to the public so that they are adequately informed and can adequately comment on significant issues surrounding impacts on the human environment. Adequate disclosure of this information will also allow decision-makers to better evaluate all reasonable alternatives and make more reasonable decisions based on a realistic sense of magnitude. 21. With respect to impact assessment, if you cannot measure or have not measured an impact then it is not a real impact. 22. Another example of theoretical impact with no real magnitude would be the lighting of a match theoretically increases the temperature of the earth's climate but in reality the magnitude is so insignificant that it is not real. All theoretical benefits to the environment must include a magnitude of the benefit. A sense of magnitude has not been used in the impact assessment and must be adequately incorporated into the impact assessment. 23. Impacts associated with beetle-killed trees, fires, and floods are acceptable to the agency. OHV impacts are insignificant when compared to beetle-killed trees, fires, and floods. A comparison to natural impacts such as beetle-killed trees, fires and flood is a reasonable test for magnitude of impacts. 24. A small level of theoretical negative impact from OHV recreation does not reasonably equate to the need for massive motorized closures. 25. OHV recreation is extremely popular in Montana. Registration statistics in 2012 show that there are 77,868 OHVs with both plate and OHV stickers and 69,378 vehicles with OHV stickers for a total of 147,606 licensed OHV vehicles. The total number of OHV registrations equates to about one OHV for every 6 residents. Note that many OHVs are used by multiple residents. At 500 miles per year per OHV (a very conservative estimate), the total miles driven per year in Montana would equal 75,000,000 miles. At an average speed of 18 miles per hour, the total hours of OHV	(44-16) Thank you for your comment, this is outside the scope of the Divide Travel Plan. (44-17) Thank you for your input.

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recreation per year in Montana is estimated at 4,167,000 hours. https://doj.mt.gov/driving/mvd-bythe-numbers/2012-total-vehicle-registrations-statewide/. At a value of $25 per hour the total value to the economy on Montana is $104,175,000 and the share attributable to the Lincoln area is a significant part of the economy. 26. Using a conservative estimate of 30 miles per visit and an average speed of 18 miles per hour, OHV visitors to the Helena National Forest travel 4,380,000 miles (146,000 x 30) and recreate at least 243,000 hours on their OHVs. The magnitude of these values indicates a significant need for OHV routes and a significant value in the use of those routes. (44-16) 27. The final 3-States OHV Rule 9http://www.fs.fed.us/recreation/programs/ohv/final.pdf) included graphic examples of ATV and motorcycle single-track trails that must be adequately identified and addressed as part of the required site specific analysis for each and every road and trail as part of the environmental analysis for any future travel planning. We request that all routes currently in use be identified in the analysis using the pictures included in the final decision. (44-17) 28. In 2011 two-thirds of Americans, or nearly 212 million, lived in counties beset by wildfire smoke two years ago, according to the analysis by the Natural Resources Defense Council. "It affects a much wider area of the United States than people realize," says author Kim Knowlton, an NRDC senior scientist and Columbia University health professor, adding the smoke can drift up to hundreds of miles. She says the smoke contains fine-particle air pollution and can not only cause asthma attacks and pneumonia but also worsen chronic heart and lung diseases. The health impacts can be dire. The 2003 wildfire season in southern California resulted in 69 premature deaths, 778 hospitalizations, 1,431 emergency room visits and 47,605 outpatient visits, according to a study led by Ralph Delfino of the University of California, Irvine. http://www.usatoday.com/story/news/nation/2013/10/24/wildfires-smoke-climate-change-harmhealth/3173165/	(44-18)The purpose of this analysis is to determine the motorized and non-motorized system routes within the planning area. Five action alternatives have been provided that look at a reasonable range of both motorized and non-motorized uses while balancing these recreational demands with environmental/biological concerns. The IDT analyzed each alternative appropriately following laws, policies, and procedures that are in place. The final decision will include future management direction that will also comply with laws, policies, manual direction. From this report GAO recommends, among other actions, that the Forest Service (1) analyze trails program needs and available resources and develop options for narrowing the gap between them and take steps to assess and improve the sustainability of its trails and (2) take steps to enhance training on collaborating with and managing volunteers who help maintain trails. HNF has a very robust partnership organization that reflects this exact plan of attack. Challenge cost share agreements, Grant writing and

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29. The Government Accounting Office (GAO) has recently released a report with recommendations on long- and short-term improvements that could reduce maintenance backlog and enhance the sustainability of trails on the public lands (http://www.gao.gov/products/GAO-13-618). Specific recommendations include Agency officials and stakeholders GAO interviewed collectively identified numerous options to improve Forest Service trail maintenance, including (1) assessing the sustainability of the trail system, (2) improving agency policies and procedures, and (3) improving management of volunteers and other external resources. In a 2010 document titled A Framework for Sustainable Recreation, the Forest Service noted the importance of analyzing recreation program needs and available resources and assessing potential ways to narrow the gap between them, which the agency has not yet done for its trails. Many officials and stakeholders suggested that the agency systematically assess its trail system to identify ways to reduce the gap and improve trail system sustainability. They also identified other options for improving management of volunteers. For example, while the agency's goal in the Forest Service Manual is to use volunteers, the agency has not established collaboration with and management of volunteers who help maintain trails as clear expectations for trails staff responsible for working with volunteers, and training in this area is limited. Some agency officials and stakeholders stated that training on how to collaborate with and manage volunteers would enhance the agency's ability to capitalize on this resource. CTVA has a long history of collaboration on trail construction and maintenance projects that we would like to continue to build on. (44-18)	partnership collaboration have been a program emphasis for the last 12 years. (44-19)These comments could also be considered economically based because they are saying there is a value in volunteer efforts in trail maintenance. (44-20) Thank you for your input.
30. Additionally, OHV recreation generates millions of dollars in OHV gas tax revenues which should be used to for trail maintenance (see additional comments and Oak Ridge National Laboratory, 1994, Federal Highway Administration, Report ORNL/TM-1999/100, Federal Highway Administration, An 80 page summary of the fuel used for OHV recreation, http://www-cta.ornl.gov/cta/Publications/Reports/ORNL_TM_1999_100.pdf). Unfortunately, these dollars are not being applied to OHV trails. Bringing	

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volunteers together with funding would solve nearly all of our OHV trail maintenance needs. (44-19) 31. The use of “unauthorized trails or roads or user-created routes” is not an appropriate term as many of these routes were created during periods going back to the 1800’s when the forest was managed without designated routes, cross-country travel was allowed, and access and use of the forest was encouraged. Many of these routes have been used for decades and are “historic routes”. Many of these routes are shown on versions of the forest map, and 7.5 minute and 15 minute USGS quadrangle mapping. The use of “unauthorized trails or roads or user-created routes” is an inaccurate representation of the management conditions and uses allowed in the past. These are also terms developed by non-motorized interests that have been given an inaccurate negative connotation through their campaigns. We request that this term be dropped from the text and that these routes be recognized as appropriate routes in the analysis. (44-20) 32. The underlying definition of the “environment” that the Forest Service has chosen to use in the impact analyses and decision-making places an emphasis and priority on the “resource” environment in the project area. NEPA was very clear that the total complement of the environment was to be considered in the impact analyses and decision-making including the guiding purpose statement “achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities” (Public Law 91-190, Title I, Section 101 (b) (5)). The wording of NEPA was carefully chosen and was intended to produce a balance between the resource environment and population or human environment. NEPA was not intended to be used to put an end to human access and use of the resources. However, the Forest Service is using the NEPA process inappropriately by creating significant cumulative impacts on the human environment through a series of travel plan decisions aimed at removing the public from public lands. This trend does not conform to Public Law 91-190 and must be corrected by implementing a pro-recreation alternative as part of this action.	(44-21) Attempts are made to provide for opportunities to both motorized and non-motorized users where viable.

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33. An excellent reference is Tom Crimmins and NOHVCC booklet titled Management Guidelines for OHV recreation which can be downloaded at http://atfiles.org/files/pdf/crimminsNOHVCC.pdf. Other good references for OHV recreation can be found in the American Trails library at http://www.americantrails.org/resources/motors/index.html and on the NOHVCC web site at http://www.nohvcc.org/home.	(44-22)Outside the scope, Divide Travel is a motorized analysis.
34. We support all of the routes shown on the alternative map attached to these comments.	
35. The 20 miles of proposed motorized trail is not adequate to meet the needs of the public. The comments and information that we have provided in this submittal and others provide adequate justification to support this statement. Certainly a motorized trail system equal to the miles of non-motorized trail system in the Helena National Forest is justified for motorized trail users. Moreover, there are over 200 miles of non-motorized trail in the immediate area just outside the project boundary so several hundred miles of motorized trail can easily be justified. Therefore, a reasonable alternative would be to at least provide a motorized trail system in the project area equal to the non-motorized trail system in the immediate area of the project. This objective can be accomplished by eliminating the conversion of motorized trails to non-motorized trails, reopening the illegal closures of the CDNST, and incorporating old logging roads with the construction of new connector segments to create loops. We request that this reasonable alternative be developed and promoted as the preferred alternative. (44-21)	(44-23)Thank you for your input. (44-24) Additional opportunities for continuous routes for wheeled motorized vehicles are addressed in Alternative 5.
36. The proposed action does not adequately consider that there are hundreds of miles of non-motorized trails available to the public in the immediate area. The balance of recreational opportunity must recognize the availability of the non-motorized trails in the adjacent wilderness area. Because the adjacent non-motorized trails were not adequately factored in to the analysis, the proposed balance of recreational opportunities does not adequately address the needs of motorized recreationists. Because of the vast wilderness area adjacent to the Divide project	(44-25) Thank you for your comment.

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area, the entire Divide project area should be multiple-use. This significant issue and a reasonable alternative to address it were not adequately considered. (44-22)	
37. Motorized recreationists value high quality trails with destinations, views, vistas, and challenging riding. (44-23)	(44-26) This is out of the scope of the Divide Travel Plan.
38. Because of the significant number of motorized visits to the forest and significant issues associated with motorized closures (both points are documented in our comments and the comments of other motorized recreationists), the preferred alternative must not reduce motorized opportunities. Moreover, in order to address the issues and needs of the public, a reasonable preferred alternative would provide for an increase in motorized opportunities. (44-24)	
39. In order to be legally defensible the following two tests must be used to identify any proposed motorized route closures: 1) the proposed closure of a motorized route must be based on site specific data and documentation of actual significant impacts caused by motorized recreation, and 2) the documented impacts from motorized recreation must be substantially more significant than naturally occurring events.	(44-27) This comment is out of the scope of the Divide Travel Plan.
40. Because of the significant negative cumulative impact of all motorized closures and if the two tests outline above are met, then a reasonable alternative that must be included for public input is a trade of the closed motorized route for a motorized route of equal opportunity and value in a different location. (44-25)	(44-28)All 4 action alternatives include a range of motorized trail options for both two-track and single-track trails. As discussed in response to other comments, we did consider an ‘equal sharing’ or pro-recreation alternative and this is described in more detail in the EIS
41. Small towns surrounded by wilderness areas such as Lincoln are struggling with the existing economic conditions which confirm that an economy based largely on wilderness recreation will be limited. Further decisions that force the economy to rely solely on wilderness and non-motorized recreation will move Lincoln in a direction that will result in further economic hardship. At the same time, Lincoln is surrounded by a significant amount of land intended for multiple-use. Managing for reasonable multiple-use on all federal lands would allow the Lincoln to further develop an economy based on snowmobile recreation in the winter and OHV	

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recreation in the summer which would bring better economic conditions to the area. This concept would not infringe on wilderness and is an entirely reasonable alternative. Therefore, a Pro-Recreation Alternative must be developed for the Divide Travel Planning project. (44-26)	
The Lincoln and Helena areas could become as successful Marysville, Utah area http://www.marysvale.org/) which is based on the Paiute trail and the Caliente and Pioche, Nevada area which is based on the Chief Mountain and Silver State Trail systems (http://nvtrailmaps.com/trail.php?trail=708). These trail systems bring in thousands of motorized recreationists who buy lodging, meals, parts, fuel, and goods in adjacent towns. The lack of adequate OHV and snowmobile access and opportunities in the Lincoln area was brought into focus by the recent controversy over the closure of the highway borrow ditches. When snowmobiles and OHVs are forced to use the highway borrow ditches confirms that there are inadequate motorized recreational opportunities in the area. This is not a desirable nor equitable situation and especially when considering the thousands of acres of multiple-use land designated in the Helena National Forest. These and other reasons support a hard look at a reasonable Pro-Recreation Alternative for the Divide Travel Planning project. (44-27)	(44-29) Thank you for your comment (44-30) Thank you for your comment.
42. There are many motorcycle single-track trail riding enthusiasts in the Great Falls, Helena, Seeley Lake, and Missoula areas. There are no significant motorized single-track trails in the proposed action. This is a significant need and the significant issue associated with not addressing this need has not been adequately addressed. (44-28)	
43. Motorized recreationists support the use of mountain bikes on the motorized trails. A reasonable alternative would be to share any proposed mountain bike trails with motorcycles. Both vehicles create and use the same “single-track” trail foot print. As proposed there are no motorcycle trails. Furthermore, based on our experience keeping trails free of downfall in the last 5 years, mountain bikers without chainsaws will not be able to maintain the trail system and it will not be	(44-31) Please refer to the Soils specialist report regarding sedimentation.

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functional. For example, on our last outing to the Helmville-Gould trail at the end of the season last fall, we had to remove 50-60 downed trees to get through even though it was late in the season. The Brooklyn Bridge route in the Clancy-Unionville area is another example of a route that is becoming closed by downfall. Motorcyclists would be quite willing to help build and maintain a motorcycle/mountain bike single-track trail system. This is a reasonable alternative that must be adequately addressed. 44. We have observed that motorized trails that have been closed to provide "non-motorized opportunities" see very little or no use. Another example is the Upper Hellgate Gulch trail closed as part of the North Belts Travel Plan. As shown below there is no evidence of use and the trail is now closed by downfall. (44-29) 45. The Continental Divide trail between McDonald Pass and Jericho Mountain, and Bison Mountain South was illegally closed to motorized recreationists by a past action. The Divide travel plan should re-evaluate that closure and mitigate for that illegal closure by re-opening this section of CDNST to motorized recreationists as required by the original legislation. Further documentation of this significant issue is provided in a separate set of comments. 46. Our members have worked to maintain all of the existing routes in the Divide Travel Plan area for over 40 years. 47. Cumulative effects of locked gates that now prevent public motorized access. This is an ever increasing issue that now significantly affects the public. http://helenair.com/news/state-and-regional/locked-gates-prevent-access-to-nationalforest/article_0428b09d-0fa2-516c-a989-e5738c8aee9a.html?print=true&cid=print http://helenair.com/news/local/road-accessing-national-forest-land-gatedlocked/article_f9d0dbde-4655-11e2-a8d3-0019bb2963f4.html?print=true&cid=print (44-30) 48. Therapy – The treatment of stress or disorders, as by some remedial,	(44-32) Thank you for your comment.

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rehabilitating, or curative process. Unfortunately, there is a significant need for OHV opportunities for therapy for our wounded warriors. We have found that riding OHVs can be some of the best therapy available for those that have served our country in the armed forces and now have a need for a curative process. 49. Held to an Unnatural Standard – air quality, water quality, impact on fish and wildlife, level of erosion. Fires, floods, natural levels of erosion all produce far greater impacts on air quality, water quality, and fish and wildlife. Motorized recreationists are being held to an unnatural standard which clearly indicates a grievous bias. Impacts associated with motorized recreation including sedimentation and disturbance of wildlife are being judged as significant when in reality they are less than the natural level of sedimentation and impacts on wildlife associated with fires and floods. Being held to a level of impact that is less than the natural level is proof of a strong bias in the evaluation process and arbitrary and capricious decision-making. (44-31) 50. Impact Assessment. With respect to impact assessment, if you cannot measure an impact then it is not a real impact. Impacts associated with beetle killed trees and fires are acceptable to the agency. OHV impacts are minimal when compared to beetle killed trees and fires. 51. Motorized recreationists are being squeezed out of the high quality places on our public lands including high elevation mountains, high elevation lakes, and other scenic areas. This trend has created significant socio-economic issues including equal access and cumulative affects that must be adequately addressed and mitigated as part of this action. (44-32) 52. A video produced by Carl Adams presents many of the significant issues and concerns that are frequently expressed by members of our club and other motorized recreationists in the community. http://www.youtube.com/watch?v=0kUhLMi97dg&feature=g-userlik& context=G23216abUCGXQYbcTJ33bB0U1oCKl_9bcFlhATY2tUW6mr0rdyBQc	(44-33) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. In all alternatives motorized opportunities are provided and within those motorized routes there are different skill levels provided for elderly and disabled use.

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53. The most equitable management of public lands is for multiple-uses. Congress recognized this need with many laws including the Multiple Use Sustained Yield Act of 1960 (16 U.S.C. 528 et seq.) and National Forest Management Act of 1976. Multiple-Use was defined as "The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people...". Outdoor recreation is the first stated purpose of the act. Note that the pre-Columbian management scheme has not been enacted by Congress. Therefore, the Bureau of Land Management and Forest Service have a responsibility to provide recreational opportunities that meet the needs of the public just as government entities provide road, water and wastewater systems that meet the needs of the public. Public Law 88-657 states that "the Congress hereby finds and declares that the construction and maintenance of an adequate system of roads and trails within and near the national forests and other lands administered by the Forest Service is essential if increasing demands for timber, recreation, and other uses of such lands are to be met; that the existence of such a system would have the effect, among other things, of increasing the value of timber and other resources tributary to such roads; and that such a system is essential to enable the Secretary of Agriculture (hereinafter called the Secretary) to provide for intensive use, protection, development, and management of these lands under principles of multiple use and sustained yield of products and services.". The Federal Land Policy and Management Act of 1976 (FLPMA) states that "(7) goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law; and, (c) In the development and revision of land use plans, the Secretary shall -- (1) use and observe the principles of multiple use and sustained yield set forth in this and other applicable law;". Multiple-use management goals are the only goals that will "best meet the needs" of the public and provide for equal program delivery to all citizens including motorized visitors. All of visitors have a responsibility to accept and promote diversity of recreation on public lands. Diversity of recreation opportunities can only be	(44-34)Fire activity is not an evaluation criterion when it comes to motorized /non-motorized route designation. (44-35) Thank you for your comment, the Divide Travel Plan is site specific to the Divide planning area of the Helena Ranger District. (44-36)Resource management is a blend of Social economic/political needs balanced with biological/ environmental needs. The preferred alternative we feel reaches this sensitive balance and provides for the public needs as it is providing for environmental concerns governed by law. The purpose of this analysis is to determine the motorized and non-motorized system routes within the planning area. Four action alternatives have been provided that look at a reasonable range of both motorized and non-motorized uses while balancing these recreational demands with environmental/biological

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accomplished through management for multiple-uses and reasonable coexistence among visitors. Multiple-use lands must be managed for shared-use versus segregated-use or exclusive-use. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964. A significant closing of motorized trails and snowmobile areas in the project area is not consistent with meeting the needs of the public and the goals of Multiple-Use Management as directed under Federal Land Policy and Management Act of 1976 (FLPMA), Multiple Use Sustained Yield Act of 1960 and P.L. 88-657.	concerns. The IDT analyzed each alternative appropriately following laws, policies, and procedures that are in place. The final decision will include future management direction that will also comply with laws, policies, manual direction.
54. The needs of the aging baby boomer population and their desire for adequate motorized access and motorized recreation is a significant issue that is brought up continually at our monthly meetings and in many discussions with other motorized recreationists. This significant issue must be recognized and given a hard look in the Purpose and Need, adequately addressed as part of the human environment and adequately addressed by the development of a reasonable Pro-Recreation alternative. (44-33)	(44-37) Please refer to Alternative 5.
55. Since 1988, forest fires have eliminated many motorized roads and trails. These losses have occurred due to deadfall, re-growth, and loss of trail tread associated with the forest fire. These losses are occurring with every fire. For example, the motorcycle single-track trail #418 from Snowbank Lake to Stonewall Mountain and road #771 the Snow-Talon fire area in the Lincoln Ranger District of the Helena National Forest has been lost to motorized use. Motorized losses due to forest fires are occurring in every National Forest in our area. The loss of motorized opportunities from fires has become a significant cumulative impact and issue to motorized recreationists. The cumulative loss and negative effect on motorized recreationists due to loss of recreational opportunities due to fires within the project area, forest and region is a significant issue that must be evaluated as part of this travel plan. The evaluation should also address mitigation measures necessary to reduce the significant impact of losses due to fires on motorized recreationists. (44-34)	(44-38) The purpose of this travel plan is to comply with the 2005 Travel Management Rule, by providing a system of roads, trails, and areas designated for motorized vehicle use. (44-39) The purpose of this travel plan is to comply with the 2005 Travel Management Rule, by providing a system of roads, trails, and areas designated for motorized vehicle use.

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56. The final OHV Rule (http://www.fs.fed.us/recreation/programs/ohv/final.pdf) required site-specific analysis as part of the route designation process. Motorized recreationists agreed to accept the rule on this basis. Site-specific analysis was mentioned 11 times throughout the rule and this project must meet the requirements for site-specific analysis.(44-35)	
57. An adequate site-specific analysis should include monitoring and quantification of existing motorized use versus non-motorized use, types of motorized use and visitors, and effects of motorized closures on the quality of the human environment. Examples and goals of site-specific analysis include: 1) single-track trails should be designated for motorcycle and mountain bike use, 2) 48" width routes areas should be designated for ATV use, 3) routes wider than 48" should be designated for UTV and 4x4 use, 4) open riding areas should be designated for trials bikes which have different riding area requirements than trail riding, and 5) motorized trail systems should be provided for all skill levels and types of popular motorized vehicles so that the needs of all motorized users are adequately addressed. Site-specific analysis in the motorized route designation process should also adequately consider the mileage of trails required for weekend camping trips, adequate destinations, and other factors. We ask that motorized recreationists be adequately queried as part of the site-specific evaluation process and that the site-specific conditions that they identify be considered as required by the Final 3-States OHV Rule. (44-36)	(44-40) Refer to the Fish Specialist report. (44-41) Refer to the Fish, Hydro, and Soils Specialist reports.
58. The Forest Service Travel Management Rule (http://www.fs.fed.us/recreation/programs/ohv/final.pdf), was presented to OHV recreationists as a "route designation" process that would designate motorized routes for the appropriate type of motorized use (motorcycle, ATV, UTV, 4x4, etc.). Some form of route designation was referred to 404 times in the final rule. The rule did not state that it would be a huge motorized closure process and it was presented and accepted by motorized recreationists on that basis. In fact, the rule specifically allows new motorized routes. The rule did not authorize or direct a massive motorized closure process. However, in actual implementation, the travel management rule is being used as a massive motorized closure tool contrary to the	(44-42)Resource management is a blend of Social

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wording of the rule and the presentation of the rule to the public during the rule making process. Implementation of the rule has included very few new routes. Proper implementation of the travel management rule is a significant issue. We request that this evaluation carefully consider the intent of the Final OHV Rule and use it to designate existing motorized routes and create new motorized routes. We also request that this action monitor the process for any misuse of the rule. (44-37) 59. The Purpose and Need for this action is to implement the Final OHV Rule. The Final OHV Rule was written to designate existing motorized routes for appropriate uses and create new motorized routes where needed. Implementation of the Final OHV Rule should not result in a massive motorized closure. The Purpose and Need for this project must follow through on the Final OHV Rule as a route designation process as it was presented to motorized recreationists during the rulemaking. (44-38) 60. Our observations in the project area confirm that most visitors are out to enjoy motorized access and motorized. The Purpose and Need does not adequately address and recognize the current highly popular level of motorized access and recreation and the need for increased motorized opportunities. Therefore, the current Purpose and Need is destined to produce a decision that does not meet the needs of the public and will not be willingly accepted by the public. To avoid this disconnect, we request that the Purpose and Need for this action be written to address the significant need for motorized access and motorized recreation in the project area including adequate recognition of the positive impact on the quality of the human environment. This approach will avoid the creation of a significant issue with the process and a serious procedural deficiency in the Purpose and Need. (44-39) 61. In an article on road de-commissioning (http://www.greatfallstribune.com/article/20110824/NEWS01/108240302/National-road-trailreme), a Forest Service fisheries technician stated that “Fish and aquatic life are adapted to natural influxes of sediment in the spring, but too much material fills spaces in the rocks where the fish lay eggs or covers the eggs.” In order to	economic/political needs balanced with biological/ environmental needs. The preferred alternative we feel reaches this sensitive balance and provides for the public needs as it is providing for environmental concerns governed by law. Public involvement has been incorporated throughout the process. (44-43)Thank you for your input, volunteer labor and partnership development are critical elements to a successful trails program.

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establish this sort of impact and associate it with OHV recreation, the Forest Service must have site-specific data on natural sediment loads in a stream and site-specific data on the gradation of the sediment from trail erosion and where it ends up. Fine-grained material may wash through the system and cause virtually no impact to fish spawning beds. Any purported impact by OHV recreation without site-specific data and analysis that connects the relatively minor amounts of sediment produced by OHV recreation on critical fish habitat is pure conjecture. Motorized recreationists have been paying a significant price in the form of lost opportunities due to the lack of site-specific data and conjectures. We request that any conjectures about potential impacts be carefully evaluated and only allowed in the analysis when confirmed by actual site-specific proofs and data. (44-40) 62. Additionally, an adequate sense of magnitude must be employed within the analysis and decision-making. For example, the total naturally occurring loss of soil from the Cibola National Forest is estimated to be on the order of 1,577 acre-feet per year (1,892,000 acres total forest area times a depth of 0.008 feet of soil loss per year). The loss associated with OHV use is on the order of 52 acre-feet (5,200 acres of roads and trails times a depth of 0.01 feet of soil loss per year). Therefore, the soil erosion associated with OHV recreation is relatively insignificant compared to the naturally occurring erosion rate and acceptable for multiple-use lands. Moreover, there are many mitigation measures that can be employed to reduce soil erosion on roads and trails while still allowing the public to enjoy them. Other examples that should be part of the evaluation include the naturally occurring mortality rate of fish and game compared to the mortality rate associated with OHV recreation. The evaluation and disclosure to the public must include the analysis and a comparison of the magnitude of OHV impacts to naturally occurring impacts for all resource areas used to assess impacts based on site-specific data. Lack of the comparison of impacts to naturally occurring levels combined with the lack of site-specific data would be a procedural deficiency that could allow inaccurate statements and opinions due to the lack of an adequate sense of magnitude. (44-41) 63. Past travel plans have suffered from “confirmation bias. Confirmation bias is a	(44-44)Thank you for your input, volunteer labor and partnership development are critical elements to a successful trails program. (44-45) Refer to the Economics Specialist report.

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tendency to favor information that confirms an individual's or group think preconceptions or hypotheses regardless of whether the information is true (http://en.wikipedia.org/wiki/Confirmation_bias). In past travel plans only studies with negative motorized conclusions have been cited. We request that the evaluation include a broad screening of issues, information, data, opinions, and needs so that it is not based on confirmation bias and meets NEPA procedural requirements. One important component required to avoid confirmation bias is the inclusion of OHV and other motorized recreationists on the inter-disciplinary team. (44-42)	(44-46)Analysis but if they are suggesting we build new trail than it's out of the scope.
64. We are very concerned about what is considered natural and what is not considered natural. First, the needs of the human environment for motorized recreation should be considered part of the natural environment (as required by the original NEPA) and adequately considered in the evaluation. Secondly, massive impacts from natural events such as fires, floods, and pine beetle (we have witnessed all of them recently) are considered acceptable while relatively miniscule impacts from motorized recreation are considered unacceptable. This sort of reasoning is clearly arbitrary and capricious and we ask that the evaluation define the natural level of impacts, develop a sense of magnitude for those impacts versus motorized impacts and carefully screen out any hint of arbitrary and capricious decision-making. In order to avoid being arbitrary and capricious, all impacts must be compared to natural levels. Impacts associated with OHV recreation should not be considered significant unless they are 50% or more of the natural level.	(44-47)Thank you for your comment
65. Motorized recreationists keep trails open for all users including motorcycle single-track trail. This issue is especially important during this period of intense downfall from trees killed by beetle infestations. A once a year trail clearing by a Forest Service trail crew is no longer adequate to keep trails open. Past closures have proven that motorized trails that have been closed to motorized use have become impassable within 3 to 5 years. Examples include the Brooklyn Bridge route in the Helena National Forest and the Middle Fork of Rock Creek in the Beaverhead-Deerlodge National Forest. At the same time motorized recreationists have proven that they are willing to work to keep trails open so that all visitors are	(44-48)As a mitigation for closing Sweeny creek the preferred

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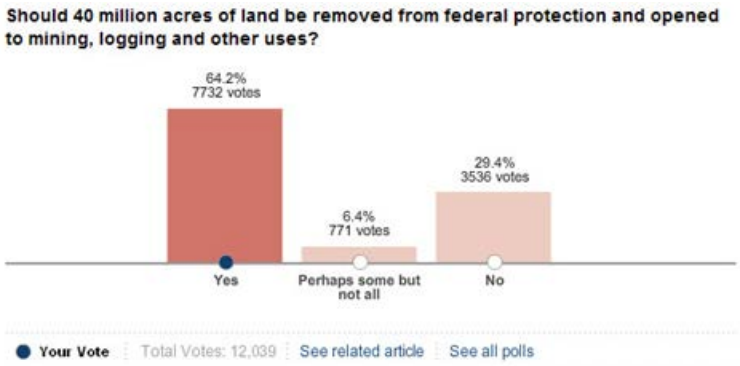
able to enjoy them. This ability to keep trails open for use by everyone is a significant advantage to designate all routes within the project area open for motorized use and this significant issue must be considered in the analysis. (44-43) 66. A recent poll in the Wall Street Journal demonstrates the overwhelming support for multiple-use of our public lands.  http://online.wsj.com/community/groups/question-day-229/topics/should-40-million-acres-land 67. Motorized recreationists keep trails open for all users including motorcycle single-track trail. This issue is especially important during this period of intense downfall from trees killed by beetle infestations. A once a year trail clearing by a Forest Service trail crew is no longer adequate to keep trails open. Past closures have proven that motorized trails that have been closed to motorized use have become impassable within 3 to 5 years. Examples include the Brooklyn Bridge route in the Helena National Forest and the Middle Fork of Rock Creek in the Beaverhead-Deerlodge National Forest. At the same time motorized recreationists have proven that they are willing to work to keep trails open so that all visitors are	alternative has OHV opportunities close to town in the Austin area. The intention of proposal was to provide for the youth area you have requested. The overall objective of this proposal is to provide a manageable system of designated public motorized access routes within the Divide planning area, consistent with and to achieve the purposes of the Forest Plan and the travel management regulations at 36 CFR 212 subpart B, as described in chapter 1.The needs for taking action in order to achieve this objective are also described in chapter 1. How well each alternative would achieve each of the components of the purpose and need is described at the end of chapter 2. The range of alternatives analyzed in the EIS reflect a balance between provide motorize and non-motorized opportunities and resource protection and the analysis presented in chapter 3 recognizes both the positive and negative impacts changes to the route system would have.

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able to enjoy them. This ability to keep trails open for use by everyone is a significant advantage to designate all routes within the project area open for motorized use. (44-44) 68. The positive economic benefit of OHV recreation in Montana is significant as documented by Montana Fish Wildlife and Parks in their report Montana Off-Highway Vehicles 2008 published in January 2009 (www.bber.umt.edu/pubs/survey/MT_OHV_2008.pdf). This report was prepared by James T. Sylvester, Bureau of Business and Economic Research, The University of Montana-Missoula and found that total OHV recreation expenditures by Montana residents was $122,900,000 in 2008. There is also a significant out-of-state expenditure that was not evaluated by this investigation. This is an especially significant issue during these tough economic times. OHV recreation based on a network of trails that attracts visitors to the area will produce a significant positive economic impact that must be given a hard look during the development of alternatives and the evaluation. (44-45) 69. The number one concern of OHV recreationists as documented by Montana Fish Wildlife and Parks in their report Montana Off-Highway Vehicles 2008 is “Access to trails”. 70. OHV recreationists have a strong interest in long distance routes where they can pack their camping gear with them and travel 90 to 125 miles. The concept is to camp 2 to 4 along the way similar to the Magruder trail in Idaho (http://fs.usda.gov/nezperce) and cover 90 to 125 miles as part of the experience. This opportunity could be developed by creating boundary trails around areas such as the Elkhorn WMA, Big Snowys and Pioneer Mountains and using connecting trails through the interior to create figure 8 opportunities. We request that this type of opportunity be evaluated as part of the planning process and that motorized recreationists be involved. (44-46) 71. Most residents of Montana are 1st, 2nd, 3rd, or 4th generation Montanans who	(44-49) The purpose of this travel plan is to comply with the 2005 Travel Management Rule, by providing a system of roads, trails, and areas designated for motorized vehicle use.

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have been raised with motorized access to their public lands. They have driven their jeeps and motorcycles to places like the Divide Travel Planning project area for decades and now many of them enjoy recreating on ATVs. This is a very important cultural issue that must be adequately considered by a travel management plan. (44-47) 72. Another significant issue that goes along with historic motorized access is associated with the way that the level of involvement in a NEPA process is used to justify motorized closures. Grandpa did not have to participate in a NEPA process and NEPA as currently practiced is not reaching most Montanans. Please do not interpret a lesser level of participation as acceptance of motorized closures and use it as a reason to support grant and foundation funded non-profit non-motorized environmental groups with paid staff. The level of participation is due to the lack of an adequate public involvement program that reaches or involves the majority of residents including motorized recreationists. The project team must be interdisciplinary and include a sufficient number of motorized recreationists that are capable of relating to and understanding the needs of motorized recreationists. At the same time, the NEPA process should seek communication with motorized recreationists equal to that afforded non-motorized environmental groups. We request that the agency carefully assess this situation and implement a NEPA public involvement program that adequately compensates for these conditions and adequately identifies the significant issues and needs of motorized recreationists. 73. There is a significant need for Youth Loops. Youth Loops would include a small area of several acres, either contained by fencing or clearly marked boundary, with short, tight trail system that is designed to entertain kids under adult supervision. The youth loop offers an alternative to unauthorized routes near camp areas and riding in campgrounds. A good example to refer to is the Lewis and Clark National Forest Travel Plan for the Little Belts. We request that this important need be adequately addressed in the preferred alternative. (44-48) 74. The current trend of excessive motorized access and motorized recreational	(44-50)The preferred alternative has diversified use patterns spread across the study area. The Austin area will provide for youth training opportunities close to town. The Treasure Mountain area will provide OHY trail loop opportunities as requested. Connecting Routes from Ontario creek to Limburger Spring provides for the long loops as requested. (44-51)Impacts from full scale roads are a consideration factor when evaluating road to trail conversions.

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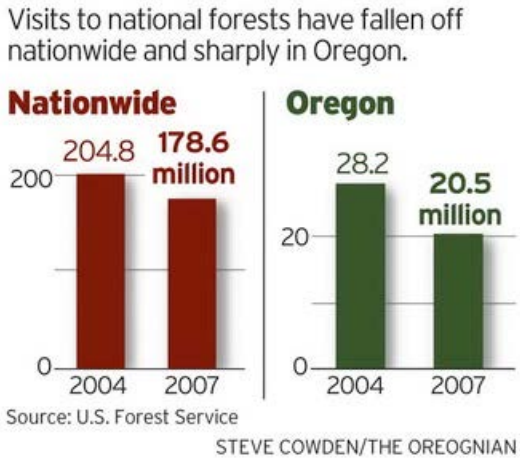
closures is having a significant impact on the number of visitors to the forest as shown in the recently released NVUM report (http://www.fs.fed.us/recreation/programs/nvum/nvum_national_summary_fy2007.pdf, http://billingsgazette.net/articles/2008/12/04/features/outdoors/18-woods.txt) and the following graphic based on that data. This trend has created significant issues in regards to adequate public access and adequate motorized recreation which much be analyzed adequately during the process. (44-48)  	

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Forest Service Region	National Forest Visits 2004 (000s)	National Forest Visits 2007 (000s)	Change in Visitation (000s)	% Change
01 Montana, Northern Idaho, Northeast Washington, North Dakota	13,200	11,265	-1,935	-15%
02 Colorado, Kansas, Nebraska, South Dakota, Wyoming	32,500	31,025	-1,475	-5%
03 Arizona, New Mexico	20,500	20,502	2	0%
04 Nevada, Utah, Southern Idaho	23,300	21,315	-1,985	-9%
05 California	30,700	28,702	-1,998	-7%
06 Oregon, Washington	28,200	20,495	-7,705	-27%
08 Southeastern US, Puerto Rico	31,000	25,867	-5,133	-17%
09 Northeastern US	22,500	17,033	-5,467	-24%
10 Alaska	2,900	2,421	-479	-17%
TOTAL	204,800	178,625	-26,175	-13%

(44-52)Thank you for your input.

75. A motorized travel plan is a plan that specifically designates roads, trails and areas for motorized use, designates which vehicles will be allowed on which routes and if seasonal restrictions apply. A comprehensive trail designation plans does the same thing except it includes all trail uses, including mountain bike, equestrian and hiking. This is a very important distinction because the anti-access groups will attempt to convince the planning team to develop a "comprehensive" travel plan by using only the existing inventory of motorized routes. They do this by identifying existing motorized trails that are good for mountain bikes, equestrians and for bird watching... or whatever. The current approach is inequitable because it takes the current motorized route inventory and tries to make it the route inventory for all users. It leaves out possibilities for constructing or otherwise developing non-motorized trails and ignores existing non-motorized trails that exist in both the planning area and adjacent lands. Now, that doesn't mean the agency can't take into consideration the effect each alternative will have on non-motorized visitors. It can - and it should be part of the NEPA analysis. But that is totally different from

(44-53)The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. In all alternatives motorized opportunities are provided and within those motorized routes there are different skill levels provided for elderly and disabled use.

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specifically providing a non-motorized trail system via the existing inventory of motorized routes. We support the creation, designation and management of non-motorized trails, but not at the expense of motorized visitors. We request that the agency not use the existing motorized trail inventory for designating non-motorized trails. Instead, if there is a need for non-motorized trails, then the agency should consider options that do not reduce the existing opportunity for motorized users. (44-49)	(44-53a) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities.
76. An adequate and reasonable preferred alternative would include an adequate quantity and quality of beginning, intermediate, and advanced routes and trails for a wide cross-section of motorized visitors including motorcycles, ATVs, and four-wheel drive vehicles. Additionally, the quantity and quality of motorized routes would be at least equal to the quantity and quality of non-motorized routes. This is the yard stick that the team should measure travel plan alternatives by. (44-50)	(44-54) All four action alternatives include a range of motorized trail options. As discussed in response to other comments, we did consider an 'equal sharing' or pro-recreation alternative and this is described in more detail in the EIS; single track opportunities were not carried forward for detailed analysis.
77. Road density does not equal motorized trail density. Impact information developed based on roads should not be used to estimate impacts from ATV and single-track motorcycle trails. ATV trails has far less impact than roads in all resource areas and motorcycle single-track trails have far less impact than roads in all resource areas. Motorized trails have less impact than roads and this condition must be recognized during the analysis and decision-making. (44-51)	
78. One of the specific requirements under NEPA is that an agency must consider the effects of the proposed action in the context of all relevant circumstances, such that where "several actions have a cumulative . . . environmental effect, this consequence must be considered in an EIS." Neighbors of Cuddy Mountain v. U.S. Forest Serv., 137 F.3d 1372, 1378 (9th Cir. 1998) (quoting City of Tenakee Springs v. Clough, 915 F.2d 1308, 1312 (9th Cir. 1990)). A cumulative effect is "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions."1840 C.F.R. § 1508.7. 3. The cumulative effect of all motorized closures has been	(44-55) All motorized trails are open to wheeled vehicles 50" or less in width.

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significant and is growing greater every day yet they have not been adequately addressed. Ignoring cumulative effects allows the agency to continue to close motorized routes unchecked because the facts are not on the table. CEQ guidance on cumulative effects was developed to prevent just this sort of blatant misuse of NEPA. 79. Because of the cumulative effects on motorized recreationists from all past and reasonably foreseeable closures and the growing need for motorized access and motorized recreational opportunities, there can be no net loss of these opportunities with this action. This can be accomplished by implementing a route designation for all existing routes. 80. A starting list of actions that should be evaluated in a cumulative effect analysis include:	(44-56) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities

Table of Cumulative Effects on Motorized Recreationists

Action	Acres Affected	Miles before	Miles after	Miles closed	% closed	Mitigation of Motorized Losses	Agency	Year
Sleeping Giant BLM	7,900	29.0	21.6	7.4	25.52%	No	BLM	2004
Elkhorn Management plan	300,000			75*	50%*	No	FS	1986
Clancy-Unionville TP	33,000	136.0	108.0	28.0	20.59%	No	FS	2001
North Belts TP	250,000	370.4	164.9	205.5	55.48%	No	FS	2005
South Belts TP	83,000	173.6	140.2	34.0	19.59%	No	FS	2008
Beaverhead-Deerlodge FP	3,364,000						FS	2009
Roads		4,157.0	4,053.0	104.0	2.50%	No		
Motorized trails**		1,237.0	1,037.0	200.0	16.17%	No		
Gallatin NF TP	1,807,000						FS	2006
4x4 Roads		417.0	347.0	70.0	16.79%	No		
ATV and motorcycle trails***		680.0	145.0	535.0	78.68%	No		
Little Belt, Castle, and Crazy TP	1,050,000						FS	2007
Roads		1,546.7	740.3	806.4	52.14%	No		
ATV trails***		226.0	208.0	18.0	7.96%	No		
Motorcycle trails		658.0	443.0	215.0	32.67%	No		
Rocky Mountain Front TP	391,700						FS	2007
Motorized Trails		209.0	74.0	135.0	64.59%	No		
Badger-Two Medicine TP	130,000	190.6	8.6	180.0	94.44%	No	FS	2009
Dillon RMP BLM	901,000	2,102.0	1,342.0	760.0	36.16%	No	BLM	2004
Butte RMP BLM	307,300	629.3	416.9	212.4	33.75%	No	BLM	2009

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Helena area		52.2	9.8	42.5	81.42%	No		
Blackfoot TP	376,000	**					FS	Ongoing
Divide TP	155,000	**					FS	Ongoing
Custer NF Beartooth TP	580,000						FS	2007
Roads		225.0	210.0	15.0	6.67%	No		
Motorized trails		341.0	267.0	74.0	21.70%	No		
Custer NF Ashland TP	437,000	**					FS	Ongoing
Custer NF Sioux TP	436,000	**					FS	Ongoing
Bitterroot NF TP	1,589,000	**					FS	Ongoing
Upper Missouri River Breaks RMP	378,000	592.0	404.0	188.0	31.76%	No	BLM	2008
Whitetail-Pipestone TP	185,700	679.0	406.0	273.0	40.21%	No	BLM	2007
Bruce Creek to Napa Point TP	141,990	60.0	40.0	20.0	33.33%	No	FS	2009
Keep Cool Hills Management Plan	14,500	20.0	0.0	20.0	100.00%	No	FS,FWP	2008
Owyhee Front Travel Plan BLM	484,873	834.0	398.0	436.0	52.28%	No	BLM	2009
Salmon Challis NF Travel Plan	4,359,000						FS	2009
Motorized trails		1,110.0	838.0	272.0	24.50%	No		
Tellico OHV area	6,000	39.5	24.0	15.5	39.24%	No	FS	2009
Moab RMP BLM	1,822,562	6,199.0	3,693.0	2,506.0	40.43%	No	BLM	2007
Monticello RMP BLM	1,800,000	3,069.0	2,820.0	249.0	8.11%	No	BLM	2007
Richfield RMP BLM	2,100,000	4,315.0	3,739.0	576.0	13.35%	No	BLM	2007
Greater Yellowstone Grizzly Bear Plan	5,893,000				25%*	No	FS	2006
Cabinet-Yaak-Selkirk Grizzly Plan	2,918,400	3,008.0	2,811.0	197.0	6.55%	No	FS	2008
Big Snowy Mountains TP*	150,000			100*	50%*	No	FS	2002
Targhee NF TP	1,789,000						FS	1997
Inyo National Forest TP	1,977,000	3,725.0	2,934.0	791.0	21.23%	No	FS	2009
Kootenai NF Three Rivers RD*****	638,000						FS	2009
Roads		2,222.0	500.0	1,722.0	77.50%	No		
Trails		161.0	0.0	161.0	100.00%	No		
KIPZ Forest Plan	5,513,000	**					FS	Ongoing
Lolo Forest Plan	2,083,000	**					FS	Ongoing
WMPZ Forest Plan	6,043,000	**					FS	Ongoing
Subtotal	**50,494,925**	**39,413.3**	**28,343.3**	**11,068.7**	**28.08%**	**No**		
Other Significant Measures of Closed Motorized Opportunities								
Yellowstone NP snow machines****		1400	318	1082	77.29%	No	NPS	2009
National Forest Cross Country opportunity (acres)	192,300,000	192,300,000	0	192,300,000	100%	No	FS	2005
BLM Cross Country opportunity (acres)	258,000,000	258,000,000	100,000*	257,900,000	99.40%	No	BLM	2006
All completed, ongoing and reasonably foreseeable FS Travel Plans	192,300,000	192,300,000	??	??	??	No	FS	
All completed, ongoing and reasonably foreseeable BLM RMP and Travel Plans	258,000,000	258,000,000	??	??	??	No	BLM	

Notes:

* estimated impact
** underway with expected significant impact
*** additional impact associated with significant loss of quality trails and substitution with roads
**** number of snow machines
***** All motorized trails closed

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(44-57) The hydrology analysis for the Divide Travel Plan Final EIS does not attempt to model the magnitude of sedimentation from roads due to the uncertainty in predicting future sediment generation from roads as a result of changes to the open/closed status. As discussed in the Hydrology Specialist Report, the Little Blackfoot and Lake Helena TMDL Reports, published by the Montana Department of Environmental Quality, cite sediment from forest roads as a major source of impairment for streams in the planning area. Eight streams are listed on the 2014 303(d) list of water quality limited streams for sediment impairments.

(44-58) The rationale for analyzing snowmobile trails as an impact on lynx comes from research and management direction presented in the Canada Lynx Conservation Assessment and Strategy (2000) and the Northern Rockies Lynx Management Direction (2007). This information is discussed in the Wildlife Background Report [“Canada Lynx” (p. 89-99, 192-203)] and in equivalent sections in the FEIS. The primary problem with

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81. Past actions that have had a significant impact on motorized recreationists in Montana as shown in the table above. Reasonably foreseeable actions including travel plans, forest plans and resource management plans will produce additional significant impacts. These actions have produced or will produce a significant debt in the mitigation bank for motorized recreational opportunities in the Helena National Forest and immediate surrounding areas and this issue must be adequately addressed. (44-52)	packed "over-the-snow routes" is not a function of how much acreage they occupy, but the access into lynx winter habitat they provide for competing carnivores (coyotes, bobcats, mountain lions, foxes, etc.) that would otherwise be unable to negotiate the deep snow that lynx are able to negotiate.
82. Because of the shortage of OHV routes necessary to reasonably meet the needs of the public, every existing motorized route is extremely important. 83. All roads to be closed to full-size vehicles should be converted to atv routes. This is a reasonable alternative for all existing roads. 84. The needs of the public for motorized recreational opportunities include a variety of trails for different skill levels. Also, routes with minimal traffic are needed as practice routes for beginning riders. (44-53) 85. The availability of motorized single-track trails has declined dramatically. At the same time, nearly all of the single-track trails see very little hiking or other use. It is not reasonable to segregate users on single-track trails. We can all get along and have done so for years. Sharing should be a primary goal for use of these lands. It is also consistent with the desegregation of public places as required by the Civil Rights Act of 1964. Therefore, it is a reasonable alternative to designate all existing single-track trails on multiple-use lands within the project area open to motorcycle use. Additionally, single-track challenge trails are needed for expert riders and trials type motorcycles. (44-53a)	(44-59)Recreation - Thank you for your input – There are many examples of successful partnership collaborations in the North and South Belts Travel decisions. Continued collaboration will be imperative in the implementation and maintenance of the Divide Travel Plan
86. The loss of high quality motorized routes in the Helena National Forest is not a reasonable alternative given the historic use of these routes and the needs of the public for access and motorized recreation. Specifically, the lack of motorcycle	(44-60) Out of scope

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single-track trail does not adequately address the issues and the needs of the public for these routes. The reasons used are completely unreasonable. Motorcycles can negotiate and prefer to use trails of the same specifications as hiking and pack stock trails. This proposal does not reasonably acknowledge or consider that motorcycle riders are; willing to share, practice Tread Lightly, have maintained these trails for years, would rather ride their motorcycles on single-track trails and have developed the skills necessary to ride a motorcycle on single-track trails. We are very concerned about the lack of understanding of the needs of single-track motorcycle riders and the complete disregard for their needs. We ask that this very important issue be adequately addressed in the document. (44-54)	(44-61) Thank you for your input.
87. National Forests in Idaho have a long and successful history of sharing single-track trails with motorcycles and we request that this strategy be used in the project area. . Details on the trail system in Idaho are shown by zooming in on the map at http://www.trails.idaho.gov/.	(44-62)All three action alternatives include a range of motorized trail options. As discussed in response to other comments, we did consider an 'equal sharing' or pro-recreation alternative and this is described in more detail in the EIS; your suggestion to use cattle trails for motorized single track was also not carried forward for detailed analysis.
88. Motorcycle trail riders enjoy riding single-track trails. Motorized single-track recreation trails are limited at this time and continue to decline. The process has not differentiated between ATV and motorcycle trails in the travel plan alternatives. In order to recognize the different needs and impacts, the evaluation must be differentiated between ATV and motorcycle trails. Figure 2.2 and 2.7 on page 14 of Chapter 2 in the 3-State OHV EIS and Decision clearly shows that existing tracks used by motorcycles are to be considered as motorized trails (http://www.mt.blm.gov/ea/ohv/Chapter2.pdf). The evaluation must consider these routes in order to meet the requirements of the 3-State OHV agreement. (44-55)	(44-63)All aspects of trail maintenance will need to be incorporated into motorized trails. Constructed maintenance features do not override the need to have trail located in a proper location.
89. Over 90% of the visitors to the project area are associated with multiple-use opportunities including motorized access and motorized recreation opportunities. These are multiple-use lands as designated by congress and must be managed as such. Recreation is a stated purpose for multiple-use lands.	(44-64)The suite of alternatives presented in the EIS suggest various options for managing roads while trying to balance recreational uses of the Forest with other resource requirements. Numerous loop opportunities are identified in Alternative 5.
90. Wilderness is closed to motorized vehicles and equipment. Therefore, multiple-	(44-65) The Forest Service strives to strike a balance with respect

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use lands should be open to motorized vehicles and equipment. Wilderness criteria and standards should not be applied to multiple-use lands.	to resource protection and providing diverse recreation opportunities. Alternative 5 seeks to enhance existing motorized routes.
91. The site specific analysis of each road or trail to be closed must address or identify where the public would go to replace the motorized resource proposed for closure. In other words, the analysis must adequately evaluate the site specific value of a road or trail proposed for closure to motorized recreationists. It must also quantify the significant negative cumulative impact experienced when motorized recreationists could not find a trail or road with a similar experience in the area. The quality of our experience has been significantly reduced. It must also quantify the significant cumulative impact that the closure of a system of road and trails would have collectively when enough routes are closed to eliminate a good motorized day outing. An incomplete analysis is not acceptable under NEPA requirements.	(44-66) We recognize the demand for both motorized and non-motorized opportunities in the planning area. We have been working cooperatively with the motorized community to develop loop trails and connectors suggested here.
92. Site specific monitoring of motorized versus non-motorized use must be provided for each route as required by the National OHV Rule.	
93. Each route must be evaluated on the basis of whether it will see more use as a motorized route or a non-motorized route and then the appropriate decision should be made on that basis.	
94. Each route must include a socio-economic analysis that includes the impacts on the public owning OHVs and looking for opportunities to use them and landowners who purchased property with the intent of being able to access and recreate using motor vehicles. (44-56)	(44-67) Roadless designation is beyond the scope of the Divide Travel Plan.
95. It would be a huge step backward for society if we had to comment on every foot of road, water line, sewer pipe, sidewalk, and motorized trail that the public needs. Gauging public need by the number of comments is not the norm in our society and should not be used in this process.	
96. We have been keeping observations of the types of visitors in multiple-use areas	

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since 1999 and have found that 97% of the visitors are motorized recreationists. The public comments and votes by how they use the forest, and more motorized access and recreation is what they are asking for with every visit.	
97. The travel management plan for the area must reflect that use and the needs of the public for motorized recreational opportunities in the area. Again, these are multiple-use lands and we ask that they remain viable multiple-use lands by not closing existing motorized routes.	(44-68) This is beyond the scope of the Divide Travel Plan, and will be considered in the Forest Plan Revision.
98. Theoretical or assumed impacts must not be used to close motorized recreational opportunities. This is happening way too often. For example, an impact on wildlife by OHV recreation is assumed on a theoretical basis but there is no site specific data or monitoring to back that statement. A similar situation is happening in other resource areas including sedimentation and noxious weeds. Decisions to close motorized recreation must not be made on the basis of theoretical or assumed impacts to the natural environment. In order to avoid arbitrary and capricious decisions, site specific data and monitoring must be presented and demonstrate a measure significant impact.	
99. A sense of magnitude must be used when making decisions about road closures based on indicators such as sediment production. For example, a route should not be closed because it is estimated to produce 10 cubic yards less sediment. The sediment yield must be compared to naturally occurring conditions which includes normal runoff, floods, and fires. The recent fires in the Helena National Forest discharged thousands of cubic yards of sediment to the area streams which is more than all of the motorized routes in the project area for the next 100 years. (44-57) Another example is the assertion that groomed snowmobile trails affect the lynx. Groomed snowmobile trails cover less than 0.001% of the total area and the impact on the lynx is of a similar magnitude. Additionally, if snowmobile trails affect the lynx, then so do cross-country and snowshoe ski trails. Again, we doubt that these impact the lynx but if snowmobiles do, then so do trails packed by non-motorized uses. Quite often non-motorized impacts are equal or greater and they must be fairly	(44-69) This is out of the scope of the Divide Travel Plan.

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assessed also. (44-58) 100. Confirmation of the significant magnitude of the impacts of fire versus the relatively minor impacts of recreation are further substantiated by the following article from the Helena IR: The popular Meriwether picnic area, located along the Missouri River in the Gates of the Mountains corridor, also will be closed until the area is deemed safe for public use. Following the 2007 Meriwether Fire, debris and numerous floods continue to flow through the picnic site, creating a serious safety hazard. The public docks will not be installed this year; instead, people should use Coulter campground. The Meriwether Picnic Area closure could remain in effect for several years, until hydrologic conditions improve in Meriwether Canyon. "Flash floods, as those happening at this site, occur when the ground becomes saturated with water that cannot be absorbed quickly enough," said Mike Cole, acting Helena District ranger. "Without live vegetation to absorb the precipitation up on the mountain, the water runs off and floods the picnic area." http://helenair.com/news/article_633fdef8-6a1c-11df-8dcf-001cc4c002e0.html?print=1 101. With respect to the position that there is not enough money to mitigate problems, motorized recreationists can work with the Forest Service as partners to obtain many different grants. (44-59) 102. Also, motorized recreationists generate significant levels of funding that would be available if the agency would pursue them and the system was working to distribute them equitably. The magnitude of gas tax paid by OHV recreationists is significant. Fuel used for off-road motorcycle, atv and 4-wheel drive recreation in Montana is estimated at 18,537,060 gallons per year (Report ORNL/TM-1999/100, Federal Highway Administration http://wwwcta. ornl.gov/cta/Publications/Reports/ORNL_TM_1999_100.pdf). Federal gas tax paid by OHV recreationists living in Montana is significant and is estimated at $3,410,819 ($0.184 tax per gallon times 18,537,060 gallons per year). The present worth of this annual amount over the past 30 years is about $58,973,000. The State	(44-70) This is out of the scope of the Divide Travel Plan. (44-71) Thank you for your input. (44-72) The Forest Service strives to strike a balance with respect

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of Montana fuel tax is $0.2775 per gallon (http://www.mdt.state.mt.us/administration/gastaxrefund.html). Therefore, an estimated $5,144,034 in state fuel tax ($0.2775 per gallon times 18,537,060 gallons per year) is paid annually by Montana off-road recreationists. The present worth of this annual amount over the past 30 years is about $88,940,000. The amount of gas tax being returned to Montana OHV recreationists through State Trails Program (STP) and Recreational Trails Programs (RTP) is less than $200,000 per year (http://www.fwp.state.mt.us/parks/trails/trailgrantapps.asp and http://www.fwp.state.mt.us/parks/ohvgrantaward.asp) or less 3% of the total annual gas tax paid by OHV recreationists. Basically OHV recreationists generate a significant amount OHV gas tax but it is not being returned for use in OHV trail projects. These monies should be used to maintain, develop, and provide environmental enhancement of OHV recreational resources but, unfortunately, it is being diverted elsewhere. This significant issue must be addressed. (44-60) 103. The most common maintenance requirement for 4x4 and OHV routes is the construction and maintenance of water bars/dips/mounds to divert runoff from the route. This maintenance could easily be provided by running a SWECO trail machine with a trained operator over each route once every 5 years. OHV trail maintenance and gas tax monies are available to fund this maintenance. Each region could set up a program similar to the Trails Unlimited program (http://www.fs.fed.us/trailsunlimited/). AmeriCorps type labor could also be used. The SWECO could not be used on motorcycle single-track trails but they typically require less maintenance and water bars/dips/mounds can usually be constructed on these trails by hand work. (44-61) 104. Where cattle grazing have established a network of cow trails, a reasonable alternative would be to allow motorcycle use on these single-track trails as there would be no change in impact or visible use of the trails. (44-62) 105. The Stream Systems Technology Center found that installing water bars at a reasonable spacing was a very effective way to reduce the sediment discharge from	to resource protection and providing diverse recreation opportunities. (44-73) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. (44-74)The Divide Travel Plan is site specific to the Divide planning area of the Helena Ranger District, and its resource and recreational needs.

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trails and roads (July 2007 Stream Notes at http://www.stream.fs.fed.us). Many other best management practices are available to control sediment production at demonstrated by the bibliography at http://www.fs.fed.us/t-d/programs/wsa/pdfPubs/road_bmp.pdf. (44-63) 106. The Helena National Forest has far less than the desired number of motorized trails. This creates two problems. First, the public will tend to "explore" closed routes in an attempt to salvage a decent outing. Secondly, it produces an unsatisfactory OHV experience. 107. The scope of the project must address both existing routes and new construction. This is necessary and reasonable because a certain percentage of the existing routes are likely to be closed. Putting a sideboard on the project scope that prevents the evaluation and creation of any new trail segments also eliminates the opportunity to mitigate the overall level of motorized closures. (44-64) This approach, if pursued, would preclude the evaluation of a reasonable alternative and also preclude any opportunity for mitigation and enhancement. Therefore, limiting scoping of the project to existing routes only would produce a significant built-in disadvantage for motorized recreationists, i.e., the overall number of motorized routes are destined to be reduced and nothing can be considered to enhance existing routes and to mitigate the overall loss to motorized recreationists. We are concerned that the process will not provide motorized recreationists with an equal opportunity (50/50 sharing of motorized to non-motorized trails) in the outcome and we are only destined to lose. We would appreciate an independent evaluation of this situation as soon as possible so that the proper scoping direction can be corrected early in the process. (44-65)	
108. Note that non-motorized recreationists can use routes that are both open and closed to motorized recreationists including roads and the evaluation of the opportunities available to non-motorized recreationists must be based on the total of all existing roads and trails. Additionally non-motorized recreationists can use an infinite amount of cross-country opportunity and motorized recreationists cannot. A	(44-75)Each route is analyzed under its own merits and geographic access. Motorized access is allowed where conducive to all other critical evaluation criteria such as wildlife security and resource concerns.

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reasonable evaluation of this condition will conclude that motorized recreationists are already squeezed into insignificant and inadequate system of routes. This point must be adequately considered in the allocation of recreation resources. (44-66)	(44-76) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. Please refer to Alternative 5.
109. Over 50% of the public land is managed by wilderness, wilderness study area, national park, monument, roadless, non-motorized area, wildlife management, and other restrictive management criteria that eliminates most or all motorized access and motorized recreation. The Final Roadless Rule published on January 5, 2001 (http://roadless.fs.fed.us/documents/rule/roadless_fedreg_rule.pdf) specifically stated "The proposed rule did not close any roads or off-highway vehicle (OHV) trails". The agency must honor this commitment. This commitment was recently upheld as part of appeal Number 07-05-10-0005 dated January 10, 2008 for the Smith River NRA travel management plan in the Six Rivers National Forest filed by Blue Ribbon Coalition (http://www.sharetrails.org/releases/media/?story=556 and www.sharetrails.org/files/SmithRiverNraBrcAppealDecisionJan14.pdf). Therefore, all (100%) of the remaining public lands including roadless areas must be managed for multiple-uses in order to avoid further contributing to the excessive allocation of resources and recreation opportunities for exclusive non-motorized use. (44-67)	
110. Jim Angell, the Denver-based Earth Justice attorney, says that's why it's too simplistic to liken roadless protections to those of full-blown wilderness designations - which take an act of Congress. "And it didn't bar things like oil and gas, which often takes place without the building of roads by angling the drilling from elsewhere; it didn't apply to ORV use which can continue without any stop," Angell says. http://www.publicbroadcasting.net/kunc/news.newsmain/article/1/0/1622248/Regional/Oral.Arguments.Heard.in.Roadless.Appeal	(44-77)Each route is analyzed under its own merits and geographic access. Motorized access is allowed where conducive to all other critical evaluation criteria such as wildlife security and resource concerns
111. The evaluation and decision-making must take into account that the total area of the National Forest equals 192,300,000 acres and out of that total 44,919,000	

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acres or 23.36% is already designated wilderness. Current forest planning actions seek to convert roadless lands to defacto wilderness even though they are designated multiple-use lands. Therefore, this percentage will be even more lopsided toward non-motorized opportunities at 53.79% assuming that 58,518 acres of roadless areas are converted to defacto wilderness areas and managed for non-motorized recreation. We maintain that the management of all of the remaining 147,381,000 congressionally designated multiple-use acres (including roadless) or 76.64% of the forest should be managed for multiple-uses. Every multiple-use acre must remain available for multiple-uses in order to meet the needs of 96.41% of the public who visit our National Forests for multiple-uses. Every reasonable multiple-use acre must remain available for multiple-uses in order to maintain a reasonable balance of opportunities. The proposed plan does not meet the basic needs of the public for multiple-use opportunities, does not provide a proper allocation of multiple-use recreation opportunities and does not meet the laws requiring multiple-use management of these lands. (44-68) 112. Basically, as shown in the table below, there is too little motorized access and too few motorized trails in the Helena National Forest. Therefore, every mile of existing road and motorized trail is very, very important. The evaluation must adequately consider and address the fact that motorized access to the Helena National Forest is relatively limited as shown by the miles of roads versus the number of acres in the following table. The miles of motorized trails are exceptionally inadequate for the thousands of OHV recreationists looking for those opportunities. Additionally, the miles of motorized trails and especially single-track is way out of balance with the needs of thousands of motorized recreationists in the region surrounding the Helena National Forest. At the same time, the miles and percentage of non-motorized trails is excessive compared to the use that they receive and this does not consider the endless cross-country opportunities that available. The total route opportunity available to non-motorized recreationists is 2836 miles and the total miles of exclusive non-motorized trails are 541 (78.52%) and the cross-country miles are infinite. The total miles of roads open to motorized recreationists are 1410 and the total mile of trails open to motorized recreationists is 148 (21.48%)	

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and the miles of cross-country opportunity is zero. Existing motorized single-track trails total about 38 miles or 5.52%. (44-69) Given the number of motorized recreationists and the miles of routes available, it should be very obvious that motorized recreationists are already squeezed into an inadequate system of routes. Under the existing condition, 12.00% of the Helena National Forest is set-aside for segregated exclusive non-motorized use for 3,000 or 0.59% of the visitors to the forest. The remaining 505,000 or 99.41% of the visits are associated with multiple-use. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964. In order to reasonably meet the requirements of integration a reasonable management goal for the remaining 88.00% of the forest would be for shared multiple-use that would produce a forest-wide 50/50 sharing of non-motorized/motorized trail opportunities and correct the current imbalance as shown in the table below. The overall allocation of existing non-motorized versus motorized access and trail riding opportunities in the Helena National Forest is a does not reasonably meet the needs of the public for motorized access and the recreational needs of motorized recreationists.(44-70) We request that this data be used to guide the decision-making to a preferred alternative that adequately meets the needs of the public by increasing motorized recreational opportunities in the project area. (44-71)	(44-78) The purpose of this travel plan is to comply with the 2005 Travel Management Rule, by providing a system of roads, trails, and areas designated for motorized vehicle use.
Region | Forest | District | NFS Acres | Current Status | Projected Date for Designation | Existing NFS Roads | Existing NFS Roads Open to Motor Vehicle Use | Existing NFS Trails | Existing NFS Trails Open to Motor Vehicle Use | Existing NFS Trails Open to Motor Vehicle Use (Single-Track) | Acres Currently Open to Cross-Country Motor Vehicle Use 1 | Helena | Townsend | 274,000 | Existing | 9/7/2006 | 719 | 414 | 228 | 45 | 13 | 0 1 | Helena | Lincoln | 376,000 | Existing | 9/8/2006 | 563 | 437 | 229 | 71 | 22 | 0 1 | Helena | Helena | 325,000 | Existing | 9/8/2006 | 865 | 559 | 232 | 32 | 3 | 0 Totals | 975,000 | 2,147 | 1,410 | 689 | 148 | 38 | 0 Miles of Open Road per Square Mile = 0.66 Total Roads and Trails Open to Non-Motorized Use, Miles 2,836 Non-Motorized Trails, Miles = 541 Non-Motorized Trails, % = 78.52% Motorized Trails, miles = 148 38 Motorized Trails, % = 21.48% Trails Open to Motorcycles % 5.52% http://www.fs.fed.us/recreation/programs/ohv/ http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf NOTE: This data is out of date by at least 8 years and does not reflect significant	(44-79) Refer to the Transportation report.

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motorized closures that have occurred since the data used to produce this table was put together by the Forest Service. This data must be updated to disclose the true balance of recreation opportunities. 113. While we do not support segregation, if segregation is to be implemented on multiple-use lands (which must be considered public places), then a corresponding goal would be to demonstrate an absolutely perfect 50/50 sharing of non-motorized and motorized trails as part of that segregation. Therefore, if the proposed plan further promotes segregation on multiple-use lands, then it must include a corresponding 50/50 sharing and it must not tip the balance further in favor of non-motorized trails and at the expense of motorized routes. (44-72) 114. It is not reasonable to reward recreationists who create and promote a culture of non-sharing on public lands.	
115. In order to bring equality to the allocation of non-motorized to motorized trails in the Helena National Forest must either convert 197 miles ((689/2)-148) of non-motorized trails to motorized trails or 393 miles (541-148) of new motorized trail must be constructed. The Divide Travel Plan must adequately address this imbalance and it was a step in the wrong direction by creating an even greater imbalance.	(44-80) The existing condition is being considered.
116. Collaboration is defined by Merriam-Webster as “to cooperate with or willingly assist an enemy of one's country and especially an occupying force”. It is not reasonable to use a collaboration process to award non-motorized interests with more non-motorized opportunities for their participation in a “collaboration process” when they already have a significant unjustified advantage in non-motorized trail opportunities when compared to motor trail opportunities (541 miles and 78.52% non-motorized trails versus 148 miles and 21.48% motorized trails). Moreover, it is not equitable to use a process that is pre-determined to provide one group or selected group’s additional advantage with the outcome of the process when that group or groups has a significant advantage at the initiation of the process. Therefore, in	(44-81) Thank you for your comment, out of scope The suite of alternatives presented in the EIS suggest various options for managing roads while trying to balance recreational uses of the Forest with other resource requirements. Numerous loop opportunities are identified in Alternative 5. (44-82) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation

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order to address this inequality any collaboration efforts used in the process must be directed to address creating more motorized trails and the outcome of any collaboration efforts must be an increase in motorized trails. 117. The following are examples of adequate OHV trail systems that should be used to guide development of this project. The alternatives for this project should be compared to these OHV trail systems. Also, it would help the project team understand the needs of OHV recreationists by visiting this area and experiencing them on an OHV. Examples of the types of systems that should be developed in the project area include: (44-74) a. Danskin Mountain in the Boise National Forest (http://www.stayontrails.com/assets/content/maps/Danskin-Mountains-map.pdf) b. South Fork Boise River in the Boise and Sawtooth National Forests c. Winom-Frazier in the Umatilla/Whitman National Forest d. Prospect OHV area in the Rogue River National Forest e. Paiute OHV System in the Fishlake National Forest f. East Fork Rock (http://www.fs.fed.us/r6/centraloregon/recreation/cohvops/efrindex.shtml), g. Mendocino National Forest (http://www.fs.fed.us/r5/mendocino/recreation/ohv/ , and h. High Lakes and Blue Lake Trail System in the Gifford Pinchot National Forest (http://www.fs.fed.us/gpnf/recreation/trailbikes/documents/trails5269small.pdf). i. Canfield Trail System near Coeur d'Alene, Idaho Panhandle National Forest, http://www.stayontrails.com/assets/content/maps/Canfield-Butte-trail-map.pdf j. In order to meet the public's need for motorized recreational opportunities, the project area and every national forest and BLM district must have OHV systems comparable to these examples. 118. Under the existing conditions with a typical width of no more than 12 feet, the 1410 miles of roads in the Helena National Forest would cover about 2051 acres (1410 x 5280 x 12 / 43560).	opportunities.

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At a typical width of no more than 48 inches, the 110 miles of ATV trails cover about 53 acres. At a typical width of no more than 24 inches the 38 miles of motorized single-track trails cover about 9.2 acres. The total Helena National Forest is covers 977,000 acres. The percentage of the total forest used by roads, ATV trails, and single-track motorcycle trails under existing conditions is respectively, 0.2099%, 0.0055%, and 0.0009%. The total area of roads and trails under Existing Conditions far less than 1% of the project area. The total area used by motorized routes under Existing Conditions is 2113 acres or 0.2163% of the 977,000 acre area. These values demonstrate the often heard concern from the public that they are being squeezed out of our public lands. The area used Under Existing Conditions is relatively insignificant and is an entirely reasonable level of use on multiple-use lands. The reduction under the proposed action produces a significant impact on the public's ability to access and recreate and is not a reasonable level of use for lands designated for multiple-use by congress (44-75). Furthermore, a Pro-Recreation Alternative that increases motorized access and motorized recreational opportunities in the Divide Travel Planning project is an entirely reasonable alternative for these multiple-use lands. (44-76)	

Acres and % of Forest for Existing Motorized Routes				
	Total Project Area (acres) =		977,000	
	Miles	Feet width	Acres	% of Forest
Miles of road	1,410.0	12	2050.91	0.2099%
Miles of ATV	110.0	4	53.33	0.0055%
Miles of Motorcycle	38.0	2	9.21	0.0009%
		Total	2113.45	0.2163%

119. In a recent article (http://www.helenair.com/articles/2008/08/01/national/80na_080801_drill.prt) about a lawsuit regarding drilling in New Mexico on the Otera Mesa, the BLM manager stated "While up to 90 percent of BLM lands are open to drilling under the plan, Childress said only 800 to 900 acres of Otero Mesa's 1.2 million would be

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permanently disturbed by roads, footpads and other drilling related activities. ‘‘I think that’s a pretty reasonable percentage,’’ he said.” We agree and find that this is a relatively insignificant percentage of the total area and quite acceptable management for multiple-use lands. 120. National OHV criteria and standards are not entirely applicable to conditions in the Helena National Forest project area and Montana, i.e. one size does not fit all. The analysis needs to allow for judgment on site specific conditions so that the decision is a better match for local conditions and customs which center on motorized access and motorized recreation. 121. The evaluation must adequately consider the growing popularity of motorized recreation, the aging population and their needs for motorized access, and the increased recreation time that the aging population has and looked forward to enjoying public lands in their motor vehicles. (44-77) 122. Specific references from the new National OHV Policy that must be adequately addressed include: Existing – The unit or district restricts motor vehicles to “existing” routes, including user created routes which may or may not be inventoried and have not yet been evaluated for designation. Site-specific planning will still be necessary to determine which routes should be designated for motor vehicle use. For many visitors, motor vehicles also represent an integral part of their recreational experience. People come to National Forests to ride on roads and trails in pickup trucks, ATVs, motorcycles, and a variety of other conveyances. Motor vehicles are a legitimate and appropriate way for people to enjoy their National Forests—in the right places, and with proper management. To create a comprehensive system of travel management, the final rule consolidates regulations governing motor vehicle use in one part, 212, entitled ‘‘Travel Management.’’ Motor vehicles remain a legitimate recreational use of NFS lands.	(44-83) Recreation – Analysis but the lit is from a different part of the US. Some might apply but some might not to the Helena Geographic Area. Each route is analyzed under its own merits and geographic access. Motorized access is allowed where conducive to all other critical evaluation criteria such as wildlife security and resource concerns.

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This final rule requires designation of those roads, trails, and areas that are open to motor vehicle use. Designations will be made by class of vehicle and, if appropriate, by time of year. The final rule will prohibit the use of motor vehicles off the designated system, as well as use of motor vehicles on routes and in areas that is not consistent with the designations. The clear identification of roads, trails, and areas for motor vehicle use on each National Forest will enhance management of National Forest System lands; sustain natural resource values through more effective management of motor vehicle use; enhance opportunities for motorized recreation experiences on National Forest System lands; address needs for access to National Forest System lands; and preserve areas of opportunity on each National Forest for non-motorized travel and experiences. Clearly the rule intended to identify existing routes being used for motorized access and recreation and preserve existing non-motorized routes by elimination of cross-country travel. Why is a process that was intended to eliminate cross-country travel and designate existing motorized routes been allowed to turn into a massive closure process? Additionally, the rule preserves existing non-motorized routes by not allowing them to be converted to motorized routes and it does not state anywhere that non-motorized travel and experiences were to be significantly enhanced by a wholesale conversion of motorized routes to non-motorized routes. The intention of the final OHV Route Designation rule must be followed by the Divide Travel Plan decision and that the rule not be used inappropriately as an action to create wholesale motorized closures and a wholesale conversion of motorized to non-motorized routes. 123. In order to be responsive to the needs of motorized recreationists, the plan must specifically allow for amendments as required to create new trails, connect trails to	(44-84) Each route is analyzed under its own merits and geographic access. Motorized access is allowed where conducive to all other critical evaluation criteria such as wildlife security and resource concerns .

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create motorized loops, extend trails, and make minor boundary adjustments to allow a motorized trail, etc.	
124. Forest Service and BLM law enforcement has taken the position that OHVs cannot legally ride on forest or BLM roads unless the road is designated dual-use. Cumulative decisions have closed OHV trails to the point that there is not an inter-connecting network of routes. At the same time, the agencies have not designated a functional network of dual-use routes to interconnect to OHV routes. Dual-use is essential for the family OHV experience. Therefore, these closure decisions are forcing the OHV recreationists to ride non-designated dual-use routes illegally. The proposed action must include these designations in order to provide a network of OHV routes with inter-connections, where required, using dual-use roads in order to be functional. This will allow OHV enthusiasts to operate legally on forest and BLM roads. We request that a system of dual-purpose roads, and OHV roads and trails that interconnect be one of the primary objectives of the travel management plan and that this objective be adequately addressed in the document and decision. The issue of speed can be adequately and easily addressed by specifying maximum speeds and signing. Without the dual-use designation, the proposed action would transform family OHV trips from a healthy family oriented recreation to an illegal activity. This is not a reasonable or acceptable outcome. (44-78)	(44-85) Resource management is a blend of Social economic/political needs balanced with biological/ environmental needs. The preferred alternative we feel reaches this sensitive balance and provides for the public needs as it is providing for environmental concerns governed by law. Public involvement has been incorporated throughout the process, Travel planning is not a balancing act to achieve mile for mile comparisons of use, and it IS a balancing act of providing public access and biological concerns.
125. The continual closure of motorized trails has forced OHVs to be operated on forest roads in order to provide a reasonable system of routes and to reach destinations of interest. The lack of dual-use designations on forest roads then makes OHV use on these routes illegal. The cumulative negative effect of motorized closures and then combined with the lack of a reasonable system of roads and trails with dual-use designation have not been adequately considered in past evaluations and decision-making. We request that all reasonable routes be designated for dual-use so that a system of roads and trails can be used by motorized recreationists. Additionally, we request that the cumulative negative effect of all past decisions that have adequately considered dual-use designations be evaluated and considered in the decision-making and that this project include an adequate mitigation plan to	(44-86) Thank you for your input.

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compensate for inadequate consideration in the past. (44-79) 126. In many cases illegal trails are created in response to the lack of adequate motorized opportunities. If there were an adequate number of OHV trail systems, then the need to create illegal trails would be greatly diminished. Therefore, the catch-22 of the closure trend is that in the end it feeds the illegal activity. In other words, it would be a more advantageous and equitable situation to pro-actively manage motorized recreation. 127. The Forest Service has only addressed less motorized access and less motorized recreational opportunities. The alternatives formulation and decision-making must adequately recognize and address the fact that the majority of the public visiting the project area want more motorized access and motorized recreational opportunities. 128. The existing level of motorized access and recreation cannot be dismissed because it is only associated with the No Action Alternative. The existing level of motorized access and recreation is reasonable alternative and an alternative other than No Action must be built around it. (44-80) 129. The Ravalli County Off-Road Users Association has found that “at the end of 2006, there were approximately 2500 “stickered” OHV’s in Ravalli County. For the past five years, the growth rate of “stickered” OHV’s has been about 20% per year. If this growth rate continues, the numbers of OHV’s in the forest will double every four years. On the Bitterroot National Forest there have been no new OHV “system” routes designated for OHV travel since 1996. History, experience and common sense tell us that when adequate, responsible, sustainable routes with attractive destinations are provided, OHV enthusiasts will ride responsibly. On the Bitterroot National Forest this means more routes, not more restriction.” The same analysis must be done for the Helena National Forest and it will find the same no growth trend and a lack of an adequate number of existing routes that is further made worse by a lack of new routes to address growth. (44-81)	(44-87)Thank you for your comments. As expected, the public comments on this project expressed the full range of opinions regarding motorized use. We heard from many people who would prefer more motorized opportunities, as well as those who would prefer more non-motorized opportunities. Both points of view were considered in meeting the Purpose and Need to better manage natural resources, improve recreation management in regard to motorized recreation and decrease user conflicts. Please see the Recreation analysis of the EIS for the effects of each alternative on motorized and non-motorized opportunities.

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130. It is not environmentally and socially responsible to squeeze motorized recreationists into the small possible numbers of areas and routes, yet this is the goal being pursued by the Helena National Forest. There is also a significant public safety aspect associated with squeezing everyone into a small area as accidents will increase with too many motorized recreationists on too few routes. We request that these significant issues be adequately addressed. (44-82) 131. Motorized recreationists endorsed and accepted millions of acres of area restriction under the Off-Highway Vehicle Environmental Impact Statement and Proposed Plan Amendment for Montana, North Dakota and South Dakota (3-State OHV) decision (http://www.mt.blm.gov/ea/ohv/FSROD.pdf) and the Travel Management; Designated Routes and Areas for Motor Vehicle Use, Final Rule (http://www.fs.fed.us/recreation/programs/ohv/final.pdf) as a positive action to control environmental impacts. We accepted area restriction and not area closure. Area closure is permanent. Area restriction allows flexibility as needed to address site specific conditions. Each motorized road and trail exists because it serves some multiple-use need. Every road and trail is important to some individual for some purpose. Each motorized road and trail must have adequate site-specific analysis to determine all of its values including motorized recreational value. Motorized recreationists gave up 97% of the area historically available to them under both the 3-State ROD and the National Route Designation rule as the ultimate act of mitigation so that we would continue to have use of existing motorized routes that cover or provide access to an area estimated at less than 3% of the total area. Now motorized recreationists have been given almost no credit for our cooperation during that action and we have only been penalized for our past cooperation by current route designations, resource management plans, forest plans and travel plans that seek to close 50% to 75% of the existing motorized routes. This outcome was not part of the 3-StateOHV and National Route Designation agreement and this level of closure is not acceptable to us for that reason. The 3-State OHV and National Route Designation agreements were not made with the intention of massive closures beyond that agreement. We ask that all BLM and Forest Service actions include	

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proper recognition of the agreement behind the 3-State OHV and National Route Designation decisions which allow continued use of the existing networks of motorized roads and trails without massive motorized closures. 132. The typical use of public lands and the typical needs of the public in our region are described on Table 2-7 in the Social Assessment of the Beaverhead-Deerlodge National Forest dated October 2002 (http://www.fs.fed.us/r1/bd/ forest_plan/revision/reports_documents/social/Forest%20Social%20Assessment%20Masterfin al%20.pdf). This document reported that the total number of forest visitors in Forest Service Region 1 for year 2000 was 13,200,000. The total number of wilderness visits was estimated at 337,000 or 2.55%. Therefore, millions of visitors to public lands (nearly all at 97.45%) benefit from management for multiple-use and benefit from motorized access and mechanized recreational opportunities which are consistent with our observations of visitors enjoying motorized access and mechanized recreation on public lands. The agency has overlooked one important aspect of the visitor use data. The visitor use data cited above is based on a percent of the total population. However, the percent of the total population visiting our public lands is a fraction of the total population. Public lands should be managed for those people that actually visit them. We request that this adjustment be made in this evaluation. The total number of individuals that visit our national forests is about 56 million (personal communication Don English, National Visitors Use Monitoring Program, Forest Service, November 29, 2005). Our total U.S. population is about 286 million (2000 Census Data). Therefore, only about 20% (56 million/286 million) of the total U.S. population actually visits our national forests. This number needs to be used as the denominator (baseline) for total forest visitors. Forest Service Chief Dale Bosworth recognized the true popularity and magnitude of motorized recreation in his January 16, 2004 speech which stated “Off-highway vehicles, or OHVs, are a great way to experience the outdoors. But the number of	

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OHV users has just gotten huge. It grew from about 5 million in 1972 to almost 36 million in 2000." We agree with the Forest Chief that 36 million is a significant number of recreationists. Additionally, the USDA Southern Research Station has recently validated the growing popularity of OHV recreation in their Recreation Statistics Update Report No. 3 dated October 2004 (http://www.srs.fs.usda.gov/trends/RecStatUpdate3.pdf). This document reports that the total number of OHV users has grown from 36 million to 49.6 million or 38% by the fall 2003/spring 2004. Based on the 2000 estimates OHV and motorized recreationists are about 64% of the population that actually visits the forest (36 million / 56 million).	(44-88) Thank you for your comment, the Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities.
This is further substantiated on page 9 of a report prepared by National Survey on Recreation and the Environment (NSRE 2000) titled Outdoor Recreation Participation in the United States (http://www.srs.fs.usda.gov/trends/Nsre/summary1.pdf) which asks the question "During the past 12 months. Did you go sightseeing, driving for pleasure or driving ATVs or motorcycles?" The percent responding "Yes" was 63.1% and the total number in millions was estimated at 130.8 million. Additionally, NSRE is often referenced by the agency but the summary statistics are skewed against motorized recreation because driving for pleasure and OHV use are split out as separate groups. These two groups represent motorized recreation and if they are added together they are as large as any other group in the survey which correctly demonstrates the magnitude of motorized recreation.	(44-89) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities.
Additionally, the Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States (http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf) determined that of the total U.S. population in the West 27.3% participated in OHV recreation and that out of the total population in Montana 29.1% participated in OHV recreation. It appears that the study is diluting the actual percentage of OHV recreationists by using total population and not the population actually visiting and using the forest. As discussed above only 20% of the total U.S. population visits the	(44-90) Thank you for your comments. As expected, the public comments on this project expressed the full range of opinions regarding motorized use. We heard from many people who would prefer more motorized opportunities, as well as those who

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forest. The percentage of Montanans that actually visit our national forests is higher than the national average and is estimated at ½ of the total state population. Based on this estimate, it is our opinion that about 60% (29.1% x 2) of the actual visitors to Montana national forests participate in OHV recreation. These surveys and data demonstrates the significant popularity of motorized and OHV recreation and the tremendous public support and need for motorized and OHV recreational opportunities. We maintain that motorized recreationists are the main group of visitors out of the total population of visitors to the national forest visiting the forest 5 or more days per year. The needs and support of motorized recreationists must be adequately addressed in this planning effort by preserving all reasonable existing motorized recreational opportunities. This planning effort must also adequately address the increasing popularity by creating new motorized recreational opportunities. OHV and dual-sport registrations in Montana grew by at least 24% from 2004 to 2005 (http://www.snowtana.com/News/Stories/OHVregister.html and FWP licensing data). (44-83) 133. The Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States (http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf) determined that out of the total population in Montana 29.1% participated in OHV recreation. The U.S. census determined that the population in 2005 was 935,670 (http://quickfacts.census.gov/qfd/states/30000.html). Therefore, the number of OHV recreationists in Montana is 935,670 times 0.291 = 272,280. 134. The Southern Research Station in their report Off-Highway Vehicle Recreation in the United States, Regions and States (http://www.fs.fed.us/recreation/programs/ohv/OHV_final_report.pdf) determined that out of the total population in Montana 29.1% or 272,280 individuals participated in OHV recreation. These numbers demonstrate the immense popularity of OHV recreation. These numbers demonstrate that there are not enough existing	would prefer more non-motorized opportunities. Both points of view were considered in meeting the Purpose and Need to better manage natural resources, improve recreation management in regard to motorized recreation and decrease user conflicts. Please see the Recreation analysis of the EIS for the effects of each alternative on motorized and non-motorized opportunities.

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motorized recreational opportunities. These numbers demonstrate that the agency's motorized closure trend is contrary to the needs of the public. The magnitude of the number of motorized recreationists is real. The misrepresentation of visitor numbers must be discontinued. Proper emphasis must be given to motorized recreation. (44-84) Additionally, the agency must understand and accept that many motorized recreationists do not participate in the NEPA process. Therefore, the agency should not be driven by the number of perceived participants and comments received. As originally envisioned and stated in law, the NEPA process should be driven by issues and needs and motorized recreationists have significant issues and needs. Motorized recreationists believe and hope that the Forest Service as a public agency will look out for their issues and needs in an even-handed way. In other words, as the process works now, the needs of largely unorganized motorized interests including individuals and families are largely ignored. The agency must not be overly influenced by organized non-motorized groups and their significant lobbying, organized comment writing and legal campaigns. The agency must adequately emphasize the needs of lesser organized and funded motorized recreationists by developing a motorized travel plan that addresses the needs associated with the numbers and popularity of at least 272,280 motorized and OHV recreationists. The current proposal does not meet these needs in a multiple-use area that is ideal for motorized use.	(44-91) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities.
135. The current allotment of recreation resources on all Forest Service lands is way out of balance with 44,919,000 acres out of 192,300,000 acres or 24% in wilderness designation while no more than 2.55% of the visitors are wilderness visitors. Designation as wilderness is further out of touch with the needs of the public because recreation is not a stated purpose of the wilderness act and, therefore, recreation in wilderness area cannot and should not be emphasized. Note that we could oppose any recreation development in wilderness areas in retaliation to non-motorized groups that go after our recreation opportunities but we have chosen not to do so. Recreation is a stated purpose in the multiple-use laws and, therefore, should be emphasized in the purpose and action.	(44-92) This is outside the scope of the Divide Travel Plan.

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136. If Roadless acres are included in this total, it becomes even more unbalanced with a total of 103,437,000 acres or 54% in wilderness or roadless designation while only 2.55% of the visitors are wilderness visitors. 137. The evaluation must adequately consider and address the fact that motorized access to the national forest is relatively limited as shown by the miles of roads versus the number of acres in the following table. The miles and percentage of non-motorized trails is excessive compared to the use that they receive and this does not consider the endless cross-country opportunities that available to non-motorized recreationists. The total route opportunity available to non-motorized recreationists is 510,575 miles; the total miles of exclusive non-motorized trails are 93,088 or 75% of the existing total. The miles of non-motorized cross-country opportunity are infinite.(44-85) 138. The total miles of roads open to motorized recreationists are 286,445 and the total miles of trails open to motorized recreationists are 31,853 or 25% of the existing total. The cross-country miles are or will be shortly equal to zero. Therefore, the overall allocation of non-motorized versus motorized access and trail riding opportunities in the national forest system is way out of balance with the needs of the public for motorized access and the recreational needs of motorized recreationists. Furthermore, we request that the data in the next two tables be updated to reflect the significant reduction in miles of roads and motorized trails that decisions have produced since this data was assembled. This revised data should be used to guide the decision-making to forest plan and travel plan alternatives that adequately meet the needs of the public by increasing motorized recreational opportunities in the national forest system. (44-86)	(44-93) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. (44-94) Resource management is a blend of Social economic/political needs balanced with biological/

Comments												Response to Comments
Region	Forest	District	NFS Acres	Current Status	Projected Date for Designation	Existing NFS Roads	Existing NFS Roads Open to Motor Vehicle Use	Existing NFS Trails	Existing NFS Trails Open to Motor Vehicle Use	Existing NFS Trails Open to Motor Vehicle Use (Single-Track)	Acres Currently Open to Cross-Country Motor Vehicle Use	environmental needs. The preferred alternative we feel reaches this sensitive balance and provides for the public needs as it is providing for environmental concerns governed by law. Public involvement has been incorporated throughout the process, Travel planning is not a balancing act to achieve mile for mile comparisons of use, and it is a balancing act of providing public access and biological concerns.
		Totals	194,015,494			385,634	286,445	124,941	31,853	15,526	65,887,245	
			Miles of Open Road per Square Mile =				0.74					
			Total Roads and Trails Open to Non-Motorized Use, Miles					510,575				
						Non-Motorized Trails, Miles =		93,088				
						Non-Motorized Trails, % =		74.51%				
							Motorized Trails, miles =		31,853	15,526		
							Motorized Trails, % =		25.49%			
								Trails Open to Motorcycles %		12.43%		
		http://www.fs.fed.us/recreation/programs/ohv/										
	http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf											

NOTE: This data is out of date by at least 8 years and does not reflect significant motorized closures that have occurred since this table was put together.

139. The evaluation must adequately consider and address the fact that motorized access to the national forest in Region 1 is relatively limited as shown by the miles of roads versus the number of acres in the following table. The miles and percentage of non-motorized trails is excessive compared to the use that they receive and this does not consider the endless cross-country opportunities that available to non-motorized recreationists. The total route opportunity available to non-motorized recreationists in Region 1 is 73,348 miles; the total miles of exclusive non-motorized trails are 14,521 or 66% of the total existing miles of trail. The miles of cross-country opportunity are infinite.

The total miles of roads open to motorized recreationists are 26,259 and the total miles of trails open to motorized recreationists are 7,521 or 34% of the total existing miles of trail. The miles of cross-country opportunity are or will be shortly equal to zero. Therefore, the overall allocation of non-motorized versus motorized access and trail riding opportunities in Region 1 is way out of balance with the needs of the public for motorized access and the recreational needs of motorized recreationists. (44-87)

Comments	Response to Comments

Region	Forest	District	NFS Acres	Current Status	Projected Date for Designation	Existing NFS Roads	Existing NFS Roads Open to Motor Vehicle Use	Existing NFS Trails	Existing NFS Trails Open to Motor Vehicle Use	Existing NFS Trails Open to Motor Vehicle Use (Single Track)	Acres Currently Open to Cross-Country Motor Vehicle Use
		Totals	26,254,657			51,306	26,259	22,042	7,521	5,052	4,352,849
				Miles of Open Road per Square Mile =			0.51				
				Total Roads and Trails Open to Non-Motorized Use, Miles				73,348			
						Non-Motorized Trails, Miles =		14,521			
						Non-Motorized Trails, % =		65.88%			
							Motorized Trails, miles =		7,521	5,052	
							Motorized Trails, % =		34.12%		
								Trails Open to Motorcycles %		22.92%	

http://www.fs.fed.us/recreation/programs/ohv/

http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf

NOTE: This data is out of date by at least 8 years and does not reflect significant motorized closures that have occurred since this table was put together and must be updated by the Forest Service.

140. Additionally, specific NVUM data for Montana National Forests shows that there were 10,055,000 total site visits to the forest and only 304,000 wilderness visits (http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf). Therefore, wilderness visits in Montana are only 3.02% of the total visits yet past decisions have produced both a disproportionately large and an increased number of recreation opportunities for non-motorized and wilderness visitors and at the expense of the multiple-use and motorized visitors. The remaining 96.98% of the visitors are for the most part associated with multiple-uses. The public comments and votes by how they use the forest, and more motorized access and recreation is what they are asking for with every visit regardless of whether they provide comments in a cumbersome NEPA process.

Table of Wilderness Visits to Montana National Forests versus Multiple-Use Visits

Comments	Response to Comments

Forest	All Site Visits (000's)	Wilderness Visits (000's)	Wilderness Visits (%)	Multiple-Use Visits (%)
Beaverhead-Deerlodge	1,377	15	1.09%	98.91%
Bitterroot	731	122	16.69%	83.31%
Custer	845	12	1.42%	98.58%
Flathead	1,514	24	1.59%	98.41%
Gallatin	1,650	46	2.79%	97.21%
Helena	508	3	0.59%	99.41%
Kootenai	1,400	32	2.29%	97.71%
Lewis & Clark	536	26	4.85%	95.15%
Lolo	1,494	24	1.61%	98.39%
Total	**10,055**	**304**	**3.02%**	**96.98%**

http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf

141. Additionally, specific NVUM data for the Helena National Forest shows that there were 508,000 total site visits to the forest and only 3,000 wilderness visits (http://www.fs.fed.us/recreation/programs/nvum/revised_vis_est.pdf). Therefore, wilderness visits in the Helena National Forest are 0.59% of the total visits yet past decisions in Region 1 and the proposed plan by the Helena National Forest have produced both a disproportionately large and an increased number of recreation opportunities for non-motorized and wilderness visitors and at the expense of the multiple-use and motorized visitors. The remaining 99.41% of the visitors are associated with multiple-uses. The public comments and votes by how they use the forest, and more motorized access and recreation is what they are asking for with every visit regardless of whether they provide comments in a cumbersome NEPA process.

142. The NVUM and Southern Research Station reports cited prove that there are 146,000 (508,000 forest visitors x 29.1% OHV) OHV visitors to the Helena National Forest and 3,000 wilderness visitors. The ratio of trail users is 49 motorized to 1 non-motorized yet the balance of existing trails is 21% motorized versus 79% non-motorized. Clearly there is an imbalance of opportunity that justifies more (not less) motorized recreational opportunities.

Comments	Response to Comments
143. As demonstrated by Table 3, the ratio of acres available to wilderness/non-motorized visitors versus the acres available to multiple-use visitors is way out of balance in the existing condition with 39 acres per wilderness visitor and 1.70 acres per multiple-use visitor for a ratio of about 23:1. The proposed action to designate all roadless areas non-motorized areas makes this inequity even worse by providing 187 acres per wilderness visitor and 0.82 acre per multiple-use visitor for a ratio of about 228:1. The available multiple-use (MU) acres and acres per MU visitors is less than this example because even though lands are designated as MU by congress the agency is effectively managing many multiple-use acres as non-motorized/defacto wilderness. Therefore, the acres per MU visitor are significantly less than shown and the imbalance of the ratio of defacto wilderness acres per visitor to MU acres per visitor is significantly greater than this example. Table 3 Acres per Forest Visitor and Ratio	(44-95) This is out of the scope of the Divide Travel Plan.

Comments	Response to Comments
	(44-96) Refer to the Economics Specialist Report.
	(44-97)Thank you for your comment
	(44-98) Thank you for your comment.

Total Annual Forest Visitors =	508,000
Wilderness Visitors =	3,000
Multiple-use Visitors =	505,000
Forest Acreage =	977,000
Existing Wilderness Acreage =	117,000
Existing Multiple-use Acreage =	860,000
Proposed Defacto Wilderness Acreage =	445,000
Total Proposed Defacto Wilderness =	562,000
Total Proposed Multiple-use Acreage =	415,000
Existing Acres/Wilderness Visitor =	39.00
Proposed Acres/Wilderness Visitor =	187.33
Percent Increase =	380%
Existing Acres/Multiple-use Visitor =	1.70
Proposed Acres/Multiple-use Visitor =	0.82
Percent Decrease =	-52%
Existing Ratio of Defacto Wilderness to MU Acres per Visitor	22.90
Proposed Ratio of Defacto Wilderness to MU Acres per Visitor	227.96
Note 1: Total Proposed Defacto Wildernss includes all Roadless Areas which the Agency is inappropriately managing as non-motorized.	
Note 2: The available multiple-use (MU) acres and acres per MU visitors is less than this example because even though lands are designated as MU by congress the agency is effectively managing many multiple-use acres as non-motorized/defacto wilderness. Therefore, the acres per MU visitor is significantly less than shown and the imbalance of the ratio of defacto wilderness acres per visitor to MU acres per visitor is significantly greater than this example.	

We recognize the desire for a quiet experience in the forest as a legitimate value. To varying degrees, we all visit the forest to enjoy the natural sounds of streams, trees, and wildlife. Forest visitors who require an absolutely natural acoustic experience in the forest should be encouraged to use the portions of the forest which have been set aside for their exclusive benefit where they are guaranteed a quiet experience, i.e., wilderness areas. Given the demonstrated underutilization of existing wilderness areas, it is entirely reasonable to conclude that there is adequate wilderness area.

Comments	Response to Comments
Given that vast areas of our forests have been set aside for the exclusive benefit of this relatively small group of quiet visitors, it is not reasonable to set aside more areas and trails for their needs. (44-88) 144. There is an estimated 147,828 OHV visitors to the Helena National Forest each year. At 20 miles per visit, OHV visitors log a total of 2,956,560 miles on OHV routes. We have observed that there is significantly more construction and maintenance provided for non-motorized trails in the Helena National Forest when compared to motorized trails and the amount of use that they receive. As a result, non-motorized trails are in better condition and there are more miles of non-motorized trail per user. Construction and maintenance efforts for motorized trails should be at least equal to that expended on non-motorized trails. This inequity is a significant issue that must be adequately addressed. For example, the Forest Service provides hundreds of wilderness rangers to patrol the wilderness, and educate wilderness visitors. Multiple-use Rangers are almost non-existent even though the ratio of multiple-use visitors to wilderness visitors is over 100:1. As required by NEPA, the evaluation and document must disclose the dollars expended annually in the Helena National Forest for construction and maintenance efforts for motorized trails and non-motorized trails. The decision must move in the direction of a motorized trail system that is equal to the non-motorized trail system. The decision must also move in the direction of an equal allocation of maintenance dollars. (44-89) 145. Based on our estimate that 40% of the visitors are OHV recreationists, we estimate using the NVUM data for total visitors that the total number of OHV visits to the Helena National Forest is 203,200 = (508,000 x .40). (44-90) 146. In addition to the studies cited above, we have observed that 97% of the visitors to multiple use areas are enjoying multiple-use activities based on motorized access and motorized recreation as shown in Table 1. (44-90) Table 1	

Comments	Response to Comments

TOTAL ANNUAL OBSERVATIONS ON MULTIPLE-USE PUBLIC LANDS 24-Dec-13

Date	Motorized Access Vehicles (Note 1)	OHV/Snow	FWD/WoodC	MTN Bike	Equestrian	X-C Skiers	Hikers / Runners	General Area/Comment	Vehicles at Hiking Trailhead (Note 2)	National Forest
1999	5	342	37	11	10	0	25	See specific years and notes below	0	
2000	11	223	49	26	3	7	15	See specific years and notes below	0	
2001	433	425	58	28	36	3	12	See specific years and notes below	15	
2002	626	499	87	72	23	7	23	See specific years and notes below	46	
2003	904	651	17	66	18	10	27	See specific years and notes below	26	
2004	869	571	62	21	13	19	11	See specific years and notes below	35	
2005	1,322	847	89	38	29	6	20	See specific years and notes below	80	
2006	990	655	55	21	7	0	35	See specific years and notes below	18	
2007	948	603	27	42	22	17	2	See specific years and notes below	69	
2008	1,437	690	38	39	10	30	24	See specific years and notes below	12	
2009	1,227	894	85	35	7	17	4	See specific years and notes below	59	
2010	1,352	1,037	49	11	2	26	16	See specific years and notes below	5	
2011	1,194	766	80	16	14	9	14	See specific years and notes below	7	
2012	1,072	758	44	17	4	8	15	See specific years and notes below	15	
2013	1,000	673	47	15	0	0	29	See specific years and notes below	2	
Column Total	13,390	9,634	824	458	198	159	272		389	
							Total Observations on Multiple-Use Lands	24,935		
				Mechanized Total	24,306	Non-mech Total	629			
				Mechanized %	97%	Non-Mech %	3%			

Note 1: Motorized access counted as vehicles being used for **fishing only** in 1999. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.
Note 1: Motorized access counted as vehicles being used for **fishing and hunting only** in 2000. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.
Note 1: Motorized access counted as vehicles being used for fishing, hunting, sightseeing, picnicing, dispersed camping, rock climbing, and wildlife viewing not counted in other categories from 2001 forward. Counted as vehicles (not occupants) which under-estimates actual motorized visitors.
Note 2: Vehicles at hiking trailhead from 2001 forward are shown to demonstrate magnitude of use but are not counted because they are not visiting multiple-use lands.

Data Source: Capital Trail Vehicle Association

Our observations of recreationists on multiple-use public lands from 1999 through 2013 is summarized in the table above (yearly data sheets available upon request) and demonstrates that out of 24,935 observations, 24,306 recreationists or 97% of the visitors were associated with motorized access and multiple-uses. Additionally, of the total number of people visiting public lands, 39% (9,634 / 24,935) were associated with OHV recreation. Furthermore, and most importantly, out of the 10,721 (9634 + 458 + 198 + 159 + 272) visitors that we observed using trails, 9,634

(44-99) Thank you for your input.

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or 90% were OHV recreationists and 1,087 or 10% were non-motorized recreationists which includes mountain bikes which are a form of mechanized travel, Therefore, the use of trails is 8:1 motorized versus non-motorized and the use of all routes is 13:1 mechanized versus non-motorized. Therefore, nearly all (97%) of the visitors to public lands benefit from management for multiple-use and benefit from motorized access and mechanized recreational opportunities which are consistent with our observations. Therefore, 90% of the trail users are motorized and 94% when including mountain bikes which enjoy using the same trails. Therefore, in order to be reasonably responsive to the needs of the public at least 90% to 94% of the trails system and public land should be managed for multiple-uses including motorized access and recreation. (44-91) 147. Out of the 24,935 recreationists that were observed, 272 were hikers and all of the meetings were pleasant. We have not experienced any user conflict in 15 years of observations. 148. The National Recreational Trails Advisory Committee identified trail-user conflicts on multiple-use trails as a concern that needed attention. The Committee worked with the Federal Highway Administration to produce a report (https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/9849/GV_191.67_T7M66_1994.pdf?sequence=1) to promote a better understanding of trail conflict, and identify approaches for promoting trail-sharing. The goal of the report was to promote user safety, protect natural resources, and provide high-quality user experiences. It reviews management options such as trail design, information and education, user involvement, and regulations and enforcement. The report found very sound ways to promote cooperation and understanding among trail users and presented ideas that will help reduce conflict on multiple-use trails. The report provides 12 principles for minimizing conflicts on multiple-use trails and we ask that each of these principles be incorporated into the travel management plan. (44-92) 149. Based on Southern Recreation Report estimates that 29.1% of the visitors are	

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OHV recreationists, the total number of OHV related visits to the Helena National Forest is 147,828 (508,000 x .291) (see NVUM citation for total number of forest visitors above). Given the 148 miles of existing motorized trails, there are 985 (147828 / 148) OHV visitors per mile of motorized trail or 1 OHV visitor every 5.3 feet. Given the 541 miles of non-motorized trail and 3,000 wilderness visitors, there are 5.55 (3,000 / 541) non-motorized visitors per mile of trail or 1 non-motorized visitor every 952 feet. Note that these statistics are at least 6 years old and do not reflect the motorized closures that have occurred during the last 6 years. This imbalance of opportunity cannot be considered equal program delivery and the proposed action must address this significant issue by creating more motorized trails. Clearly the current proposal would be a step in the wrong direction. (44-93) 150. The Government Accountability Office (GAO) report on OHV recreation has been prepared and released to the general public (http://www.gao.gov/Products/GAO-09-509). GAO investigators interviewed agency personnel, OHV rider and industry representatives and environmental group representatives. GAO issued a number of findings in terms of OHV recreation on public lands. GAO highlights include that OHV recreation is growing in popularity and that more Americans are seeking access to federal public lands via their OHVs. Second, the report found that the federal land agencies could do a better job of providing signage and general outreach to the recreating public so that visitors to public lands have a better understanding of where they can and cannot ride their OHVs. The report also focused attention on the inadequacies of law enforcement and the inconsistent scale of fines and penalties for inappropriate behavior on public lands. GAO found that the land agencies were stretched, both in terms of financial resources and personnel, and that other pressing concerns, such as fighting wildfires, apprehending drug criminals and border control issues kept agency personnel from devoting the necessary time to make public lands more accessible to recreation visitors. GAO looked into the issue of environmental damage caused by OHVs and found such damage is far less than some observers believed to be the case. Another finding was that agency personnel worked well with OHV user groups on trail maintenance projects. The report's conclusions confirm what we have known for a	

Comments	Response to Comments
long time about OHV recreation on public lands and provide further reason to continue working on our priority issues. Motorized recreationists will continue to carry on our efforts to support law enforcement reform legislation as well as seek additional funding for better signage, maps and trail maintenance. Working with the Congress and our land agencies, we can create an environment where OHV recreation can continue to grow in popularity as more American families look to explore and enjoy the great outdoors. 151. The Forest Service must give a hard look at the impact of motorized closures on the human environment. Per CEQ guidance, NEPA documents are to be driven by significant issues. Motorized closures and the lack of adequate motorized opportunities have a significant impact on motorized recreationists. The impact of motorized closures on the health of our members and the loss of the benefits of OHV recreation are significant issues to motorized recreationists. In order to make a reasonable decision, the Forest Service must adequately considers the issues and impacts associated with motorized closures on the mental and physical health of the public. These issues are critical due to the cumulative effect of all motorized closures. (44-64) As one example, consider the motorized closure of the Scratch Gravel Hills near Helena. Members of our group collected over 300 signatures on a petition protesting that closure. Many of the signatures were from high school students. Now there is no place close to Helena that young people can go. What are they doing now? It is not as positive as riding their dirt bike or ATV in the hills. Now multiply that by the thousands of miles of roads and trails that have been closed to the public. The following health issues and benefits of OHV recreation must be addressed in order to arrive at a reasonable decision for this action. A. Sadly, one indicator of the condition of the human environment in Montana is the suicide rate. Montana ranks number 2 in the nation (http://www.suicide.org/suicide-statistics.html). This significant problem has been specifically identified as requiring special attention by the Department of Health and Human Services http://www.dphhs.mt.gov/amdd/statesuicideplan.pdf. Motorized recreation is popular and it is a very healthy and positive human activity that can help address	

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this significant human issue (http://www.marketwire.com/press-release/The-Results-Are-in-Off-Road-Vehicle-Riding-is-Good-for-Your-Body-and-Soul-1310189.htm). The Forest Service can help address this significant problem by providing an adequate quantity and quality of motorized recreational opportunities. We ask that you adequately address this significant issue associated with the human environment. B. Videophilia - the new human tendency to focus on sedentary activities involving electronic media has become a significant social problem in the U.S. (Pergams, O. R. W. and P. A. Zaradic. 2006. Is love of nature in the US becoming love of electronic media? 16-year downtrend in national park visits explained by watching movies, playing video games, internet use, and oil prices. Journal of Environmental Management 80:387-393). The study shows that people in the US and other developed nations are spending far less time in nature than ever before. The study tested trends in nature participation in 16 time series in the categories of visitation to various types of public lands in the US, Japan, and Spain; number of various types of game licenses issued; amount of time spent camping; and amount of time spent backpacking or hiking. The four activities with the greatest per capita participation were visits to Japanese National Parks, US State Parks, US National Parks, and US National Forests, with an average individual participating 0.74-2.75 times per year. All four are in downtrends and are losing between 1% and 3% per year. The longest and most complete time series show that these declines in per capita nature participation typically began between 1981 and 1991, are losing about 1% per year, and have so far lost between 18% and 25%. At the same time, the interest and desire to participate in OHV recreation in the outdoors is increasing and strong as previously documented. OHV recreation is a reasonable alternative to increase participation in outdoor activities and we request that this issue and solution be adequately addressed by this plan by implement more OHV opportunities. C. In the past 30 years, the prevalence of overweight and obesity has increased sharply for both adults and children. Between 1976–1980 and 2003–2004, the prevalence of obesity among adults aged 20–74 years increased from 15.0% to	

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32.9%. This increase is not limited to adults. Among young people, the prevalence of overweight increased from 5.0% to 13.9% for those aged 2–5 years, 6.5% to 18.8% for those aged 6–11 years, and 5.0% to 17.4% for those aged 12–19 years. (Reference: ttp://www.cdc.gov/nccdphp/dnpa/obesity/). This disturbing trend has prompted the President to promote a health and fitness initiative (http://www.whitehouse.gov/infocus/fitness/toc.html) and OHV recreation is an activity that meets the physical requirements of the President's fitness program and counters the epidemic of videophilia. D. Research by the Ontario Federation of Trail Riders studied 310 off-road motorcycle enthusiasts and found that the physical exertion was on the order of 60% of VO2max, or 80% HRmax, or 9.3 METS which is slightly greater than jogging (Characterizing the Physical Demands of Off-Road Motorcycling, Executive Summary, Jamie Burr, Norman Gledhill, Veronica Jamnik, Ontario Federation of Trail Riders, February 2007, http://www.oftr.org/OFTR_Fitness_Study.pdf). E. The July 2010 issue of Medicine & Science in Sports & Exercise, the Official Journal of the American College of Sports Medicine (ACSM), "Physiological Demands of Off-Road Vehicle Riding") focuses specifically on the physiological demands of off-road vehicle (OHV) riding, compares them to the demands of other recreational activities, and explores the health and fitness benefits that OHV participation can provide (http://www.nohvcc.org/Tools/TopicLibraries/Health.aspx). The study concluded that the health benefits of OHV recreation include: • Off-road vehicle riding was found to require "a true physiological demand that would be expected to have a beneficial effect on health and fitness according to Canada's current physical activity recommendations". • Off-road vehicle riding was determined to be a recreational activity associated with moderate-intensity cardiovascular demand and fatigue-inducing muscular strength challenges, similar to other self-paced recreational sports such as golf, rock-climbing and alpine skiing.	

Comments	Response to Comments
• Oxygen consumption, which is an indicator of physical work, increased by 3.5 and 6 times the resting values for ATV and ORM riding respectively – which falls within moderate intensity activity according to the American College of Sports Medicine guidelines and is in line with Canadian physical activity recommendations. • The duration of a typical ride (2-3 hours for ATV, 1-2 hours for ORM) and the frequency of the rides (1-2 times a week) create sufficient opportunity to stimulate changes in aerobic fitness which falls within the physical activity guidelines (American College of Sports Medicine recommends between 450 – 720 MET minutes per week). • Using heart rate measurements alone, the demands of riding belong to the category of "hard" exercise – this increase of intensity may be linked to heightened psycho emotional responses (i.e. adrenalin), an effect of heat stress while riding, or a response to repeated isometric squeezing of the handlebars. • When considering muscular force and power involvement, study results indicate a greater impact on muscular endurance as opposed to an increase in strength. • Off-road vehicle riders perform considerable physical work using their arms and upper body. This upper body strength requirement "could lead to beneficial training increases in musculoskeletal fitness". • Study findings also picked up on the psycho-social effects of riding – the "enhanced quality of life and stress reduction effects of off-road riding". • Findings also reflect the importance of alternative physical activity such as off-road riding to promote physical activity in a group who might otherwise forego exercise altogether. F. Research by a leading neuroscientist has determined that riding a motorcycle helps keep riders young by invigorating their brains. The brain functions were measured by devices put on the heads of 22 males while riding motorcycles. The researchers found that the rider's brains prefrontal areas became highly activated. This is the area of the brain that covers memory, information processing and concentration functions. The research was conducted by Ryuta Kawashima, the scientist behind popular "Brain Training" computer software at Nintendo.	

Comments	Response to Comments
One experiment involved 22 men, all in their 40s and 50s, who held motorcycle licenses, but had not taken a ride for at least a decade. They were randomly split into two groups. The first group was asked to resume riding motorcycles in everyday life for two months, the other group was asked to keep driving their cars or trucks. "The group that rode motorbikes posted higher marks in cognitive function tests," Kawashima said. Another test, required the men to remember a set of numbers in reverse order, “the riders' scores jumped by more than 50 percent in two months, while the non-riders' marks deteriorated slightly,” said Kawashima. It should also be noted that the riders in the study mentioned that they made fewer mistakes at work and felt happier. "Mental care is a very big issue in modern society," says Kawashima. "I think we made an interesting study here as the data shows you can improve your mental condition simply by using motorbikes to commute.” The study goes on to display that a motorcycle rider's brain becomes tenser and is in a heightened alertness in order to process information actively during riding. The obvious payoff is that riding a motorcycle helps keep riders young by invigorating their brains. http://www.dijtokyo.org/events/SMP_DAY1_Kawashima.pdf http://motocrossactionmag.com/Main/News/MOTORCYCLES-MAKE-YOU-SMARTERJapanese-Study-Discov-5756.aspx We have observed that the same benefits that Kawashima has documented for motorcyclists also extend to all OHV recreation. We ask that the tremendous value of OHV recreation for both mental and physical health benefits be recognized in the evaluation and used to justify an increase in motorized recreational opportunities. (44-94) 152. The positive economic impact on the economy of the area is another socio-economic factor that must be adequately considered in the decision-making and	

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especially during these times of economic recession. Arizona State Parks has prepared a good example of an economic analysis of OHV recreation for Coconino County, AZ (http://www.gf.state.az.us/pdfs/w_c/OHV%20Report.pdf). The economic impacts of OHV recreation in one county are significant with $258.3 million statewide impact and a $215.3 million impact locally that supports 2,580 jobs. Off-highway vehicle recreation activity is an immensely powerful part of the Arizona collective economic fabric, generating nearly $3 billion in retail sales during 2002 (http://www.gf.state.az.us/pdfs/w_c/OHV%20Report.pdf). (44-96) 153. There are 17 references to climate change in the NOI for the forest planning rule (http://fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5110264.pdf). Climate change is mentioned far more than any other issue. This apparent focus is not balanced with objective science and the needs of the public. The existence of climate change and any positive or negative impacts are simply not known at this time. There are many in the scientific community that support this position (44-97)(http://www.sepp.org/Archive/NewSEPP/LttrtoPaulMartin.html , http://sciencepolicy.colorado.edu/admin/publication_files/resource-2803-2010.06.pdf , http://www.climatesciencewatch.org , http://epw.senate.gov/speechitem.cfm?party=rep&id=263759). The climate has always been changing. Twelve thousand years ago North American was covered by ice. Before that dinosaurs roamed the area in a humid climate. The planning rule should not create impacts on the human environment because it "presumes" that the climate is changing any more or less than it always has. The planning rule must be based on extensive long-term credible scientific study. (44-98) The quality of people's lives cannot be compromised by a ghost issue without adequate basis. We only get one shot at this life and we want to experience the positive benefits of OHV recreation. Extensive long-term credible scientific conclusions on climate change do not exist at this time and, therefore, it would be unreasonable to make any assumptions about climate change and use those assumptions to impose any impacts on the human environment including motorized recreation in the planning rule. Additionally,	

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• Global temperatures are not warming. Since 1998, global temperatures have decreased almost half a degree C. • The average temperature in the US in 2009 was lower than every year since 1996 and lower than the overall average for the last 114 years. • Manmade CO2 concentrations in the atmosphere are about 19 PPM (5% of 387 PPM overall CO2) which is 1 part in 51,680 total parts – in no way significant. (Hydrogen cyanide gas is one of the most poisonous gases known to man and allowable working conditions for this gas in most of the US are 20 ppm. Carbon dioxide is harmless and actually helpful to plant life and total concentrations of it in the atmosphere by manmade causes are only 19 ppm. Carbon dioxide concentrations at present are near the LOWEST in geologic history. (http://co2now.org/) • There is no statistical correlation between CO2 concentrations in the atmosphere and global temperatures. (Source: http://www.drroyspencer.com/2010/01/december-2009- uah-global-temperature-update-0-28-degree-c/) • Global sea ice has increased by 200,000 square kilometers since 1980. (Arctic Sea Ice – down 900,000 Sq Km, Antarctica Sea Ice – up 1.1 Million Sq Km). Global Sea Ice: 1980 2009 Southern Hemisphere Antarctic 4.7 5.8 Northern Hemisphere Arctic 15 14.1 Total Global 19.7 19.9 • Polar bear populations are much higher today than they were 30 years ago. (http://www.telegraph.co.uk/comment/columnists/christopherbooker/5664069/Polar bear-expert-barred-by-global-warmists.html) • Over 95 % of the so-called “greenhouse effect” is caused by water vapor (evaporation of the oceans). • There is no evidence that would purport that motorized recreation has a significant impact on the climate or climate change.	

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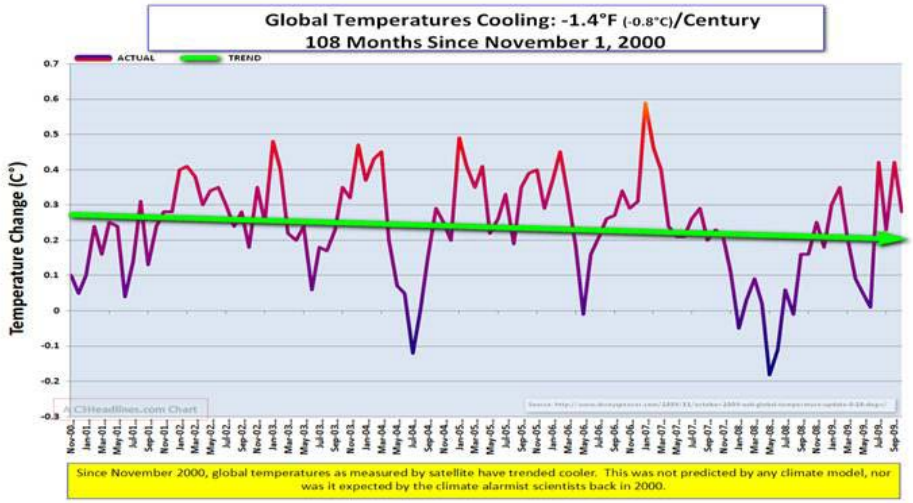 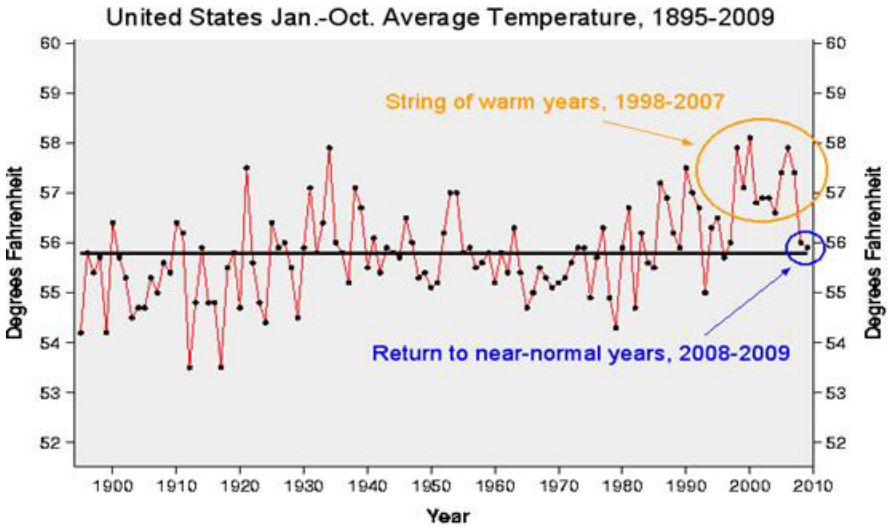	

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The average temperature in the US in 2009 was lower than every year since 1996 and lower than the overall average for the last 114 years. 154. Increasing levels of carbon dioxide have been blamed for a warming trend or climate change. Many studies have found that forest fires are a tremendous source of carbon dioxide. http://www.sciencedaily.com/releases/2007/11/071101085029.htm Why are forest fires with such a significant production of carbon dioxide acceptable and other sources not acceptable? Why aren't we doing more to proactively prevent forest fires and manage our forests? (44-99) 155. Why do people persist in believing things that just aren't true? Research conducted by Brendan Nyhan, a professor of political science at Dartmouth and Lewandowsky professor at the University of Western Australia has concluded that it is when there's no immediate threat to our understanding of the world, we change our beliefs. It's when that change contradicts something we've long held as important that problems occur. If information doesn't square with someone's prior beliefs, he discards the beliefs if they're weak and discards the information if the beliefs are strong. Even when we think we've properly corrected a false belief, the original exposure often continues to influence our memory and thoughts. Strongly held beliefs continued to influence judgment, despite having the correction information and correction attempts—even with a supposedly conscious awareness of what was happening.	
(45) May 27, 2014 Please find attached comments from Helena Hunters and Anglers Association regarding the Divide Travel Plan DEIS. Thank you. Jim Posewitz, Secretary Helena Hunters and Anglers Association	(45-1) All – This letter is almost identical to the one submitted by Gayle Goslin on behalf of her family. Please reference comment 23 for responses.

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219 Vawter Street Helena, MT 509601 406.449.2795 Mr. William Avey — Forest Supervisor — Helena National Forest — 2880 Skyway Drive — Helena, Montana 59602 Ms. Heather DeGeest — District Ranger — Helena Ranger District — 2880 Skyway Drive — Helena, Montana 59602 Ms. Jamie Tompkins — ID Team Leader — Helena National Forest — 2880 Skyway Drive — Helena, Montana 59602 SUBJECT: Divide Travel Plan DEIS Comment Summary Dear Supervisor Avey, Ranger DeGeest, and Project Leader Tompkins: Helena Hunters and Anglers Association (HHAA) members live, work, and recreate on the Helena National Forest, and several of our members are intimately familiar with the Divide Travel Planning Area. Much of our membership is made up of professionally trained natural resource managers. We either are now or have previously worked in the fields of fish, wildlife, forestry, recreation management, water quality, cultural resources and environmental assessment. Our mission statement is commensurate with stated management objectives for the Helena National Forest: "The Helena Hunters and Anglers Association is dedicated to protecting and restoring fish and wildlife to all suitable habitats, and to conserving all natural resources as a public trust, vital to our general welfare. HHAA promotes the highest standards of ethical conduct and sportsmanship, and promotes outdoor hunting and fishing opportunity for all citizens to share equally." The following members of our club formed the Divide Travel Management Evaluation Committee, and include: Steve Platt, Gary Ingman, Bill Orsello, Charlie McCarthy, Thomas Baumeister, Doug Powell, Jim Posewitz, and Stan Frasier. We	

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are tiering our comments off of and adding to those of HHAA Issues Chair, Gayle Joslin. We have reviewed the conceptual alternatives in the Divide Travel Planning area and provide extensive detailed comment in the attached narrative. Our comments focus on the following subject areas: Wildlife Big Game Security Standard/Amendment Roadless Areas Water Quality Individual Road Recommendations Alternatives Cumulative Effects Monitoring, Enforcement and Schedule Recommendations Specific comments on individual roads/routes presented in the 2014 Divide Travel Plan and how they might be improved for the benefit of wildlife and other natural resources are also provided for your consideration and action. Wildlife Linkage The Divide Travel Planning area constitutes one of the most important linkage zones in the Northern Region. It connects the Northern Continental Divide, Yellowstone, and Salmon-Selway ecosystems, yet 19th century mining and over-exuberant 20th century USFS timber harvest have left it as one of the most roaded, fragmented, and fragile areas of National Forest lands in Montana. It consists of relatively open, park-like landscapes. In the last few years much of this area's forest has experienced extensive beetle-kill. The Divide Landscape of the Helena National Forest constitutes the central linkage connection between all areas of western and central Montana as described by	

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American Wildlands (2008) and Montana Fish, Wildlife and Parks' analysis of wolverine movements (2008 Furbearer Regulations). The Divide Landscape is the center or "Hub" of wildlife linkage within the state of Montana. Its ability to continue to function in this capacity is critical for low-density, far-ranging carnivore species such as grizzly bears, wolverine, mountain lions, wolves, lynx, as well as wide-ranging ungulate species (elk, moose, and bighorn sheep). Bighorn sheep have been seen at the headwaters of Minnehaha Creek, along the Continental Divide in the Divide Landscape even though this is not bighorn habitat. Another marked bighorn from the Sleeping Giant area was located near Elliston, attesting to the linkage importance of the Divide landscape. And yet the Divide Landscape is a relatively battered place in need of careful, restorative management. Maps of seasonal elk distribution over a portion of the Divide Landscape (Divide elk maps 27-34) demonstrate the importance of the Helena National Forest lands along the Continental Divide. Maps from 2008 showing wolverine and lynx distribution for the MacDonald Pass area are also available. Additional information on low-density mid-sized carnivores for a broader area of the Helena National Forest has been compiled by wildlife contractor Wild Things Unlimited. They report: "Our cameras obtained photos of several different wolverines, and added valuable data related to year-round use of an area of atypical wolverine habitat including: relatively low elevation, roaded, and with human uses such as logging, hunting, and snowmobiling. We believe this is extremely important to wolverine conservation in Montana. Last winter's efforts resulted in documentation of more previously unknown lynx and wolverines in the Helena National Forest study area, which is exciting and valuable news." In addition, the Wildlife Conservation Society has defined a crucial area connecting the three major wolverine ecosystems as the Central Linkage Ecosystem that includes the Divide Landscape (Inman et al., 2008). Grizzly bear occurrences throughout the Divide Landscape attest to the area's	

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importance as a linkage zone and year-long habitat in areas such as Nevada Mountain, Snowshoe Creek, Hahn-Hat Creek near Elliston, and the Little Blackfoot River. Travel planning actions taken to improve landscape linkages, in the form of limiting duplicative motorized road and trail use in the Divide area, would be an important and positive step. Alternative 3 clearly does the best job of that, but still can be improved upon. Effects of Recreation on Wildlife National Forest management decisions are required to be based upon "the best available science." In borrowing from the Montana Chapter of The Wildlife Society's January 14, 2009 comment on the Divide Travel Plan, it should be noted that the Chapter undertook a comprehensive effort to address the Effects of Recreation on Rocky Mountain Wildlife – A Review for Montana1. That document, and its associated on-line bibliography, was partially funded by the USFS. Copies of the report were provided to every National Forest and most ranger districts in Montana. The Effects of Recreation report was compiled by 35 wildlife biologists from state, federal, university and private settings from across Montana who volunteered their time specifically to provide this information to land and wildlife managers. The Divide Draft EIS cites the Montana Chapter of The Wildlife Society document in the References section. However, the material provided in the document does not appear to be utilized or referenced in the DEIS, either in the various Wildlife chapters or the Recreation chapter. Valuable scientific information was provided for all wildlife species groups including amphibians and reptiles, small mammals, birds, ungulates, carnivores, and semi-aquatic mammals. In addition, discussion about impacts from recreational uses to soils, water, and vegetation was presented. Several Chapter members have been responsible for collecting information for this specific area over the years. Within the chapter on Ungulates, the following comments pertaining to big game security are noted: "Managers of public lands control only a few of the potential variables that	

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contribute to security including retention of important vegetative cover, travel management, and enforcement of travel regulations. There is a strong relationship between adequate security and predicted buck/bull carryover"1 Three key issues are mentioned: vegetative cover, travel management, and enforcement of travel regulations. Since the final selected alternative will determine the effectiveness of the proposed big game security forest plan amendment, these subjects must be fully addressed within the FEIS and reflected in the selected Alternative. Previously, the Montana Chapter of The Wildlife Society noted the following, and these comments are still relevant to the Draft EIS: Established analysis procedure requires that the USFS use the best scientific and commercial information available and ensure that any final decision is based on the most recent, up-to-date information on wildlife use of the area. Conversion of previously closed routes to open routes for motorized use has not been analyzed or justified with respect to initial closure rationale and whether the purposes for initial closure have changed. The proposed action must be in compliance with the Helena National Forest Plan. At present, the proposed action does not appear to be in compliance with standards for soils, watersheds, elk (security, summer and winter range standards), or the Northern Rockies Lynx Management Direction. User-created roads (whether they are called roads or trails) must be closed and reclaimed, and should not be included in the transportation system. These "user created routes were developed without agency authorization, environmental analysis, or public involvement and do not have the same status as National Forest System roads and trails included in the forest transportation system" (70 Fed. Reg. 68268). In other words, these illicit routes were illegally created, never authorized	

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by the USFS, and have never undergone any form of NEPA analysis. As such, these user created routes must be immediately closed, repaired, reseeded, and excluded from the USFS's transportation network. The USFS cannot and should not legitimize such routes or reward OHV users for their illegal and destructive behavior by now designating such routes as part of the new transportation system. The Sweeny Creek, Priest Pass, and Greenhorn Mountain areas are prime examples of places on the Divide Landscape where illegal motorized use and lack of USFS travel management have led to a plethora of illegal routes that are damaging soil and water quality, and compromising important wildlife habitat. The USFS must initiate and complete formal consultation on lynx pursuant to Section 7 of the Endangered Species Act. The USFS must ensure compliance with the Travel Management Rule and all relevant Executive Orders – including Executive Order 11644 (as amended by Executive Order 11989). At present, the proposed action is not in compliance with Executive Order 11644's duty to locate areas and trails to minimize damage to soils, watersheds, and vegetation, minimize harassment to wildlife, or minimize conflicts with users. Big Game Security Standard/Amendment The existing big game security standard was based on published literature derived from 15 years of research on the specific topic of road density, placement, and timing of use in Montana (Lyon, et al. 1985). The document, Coordinating Elk and Timber Management3, was conducted in four study areas and concluded: Road density and pattern, including off-road travel, play an important role in determining the security level an area provides to elk during the hunting season. An area with sparse cover and low road densities may provide as much security as the same size area with heavy cover and high road densities. (8)	

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Conversely, it is also true that areas with heavy cover and high road densities may provide as much security as the same size area with sparse cover and low road densities. However the proposed big game security standard would eliminate all reference or requirement for cover. With respect to security and the need for cover, Lyon et al. (1985) stress: Road density and cover quality are both important when considering adequate elk security during the hunting season. (8) Central Montana elk require the greater security provided by good cover at the edge of the opening. (10) The proposed big game security amendment was not derived from field research, nor is it based on full application of scientific literature on the subject of elk vulnerability. None of the literature presumes that during the hunting season no vegetative cover is required. In circumstances where little cover is naturally available, such as the Missouri River Breaks, topography must substitute for vegetative cover. However, the hunting season must be severely restricted through permit-only hunting to compensate for the lack of security. The proposed big game security amendment merely draws polygons on the landscape and declares that these areas will provide big game security. No longer would all National Forest lands be potential elk security and big game security would be relegated to a series of polygons. Additionally, the requirements for non-cover vegetation that Lyon et al. recommended have not been described and listed as caveats for these polygons. Those requirements as described by Lyon et al. include: Clearcuts: Openings should be small, even though openings up to 100 acres may be acceptable where the adjacent forest edge supplies adequate security. Provide undisturbed security areas adjacent to the area of activity. Concentrate management activity into the shortest possible time (including follow-up activity such as planting and burning) (39). Confine disturbance to the smallest area possible within a single drainage (39).	

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It must be noted that the knowledge of elk security with respect to vegetative cover and roads described in "Coordinating Elk and Timber Management" (1985) was signed and adopted unilaterally in 1984 by the Bureau of Land Management (Edwin Zaidlicz, State Director), the Northern Region U.S. Forest Service (Tom Costain, Regional Forester), School of Forestry, University of Montana (Benjamin B. Stout, Dean), Montana Department of Fish, Wildlife and Parks (James W. Flynn, Director), and the U.S. Forest Service, Intermountain Forest and Ranger Experiment Station (Laurence El. Lassen, Director). We question on what grounds and based on which literature is the Lyon et al. (1985) time-tested approach to elk security being tossed out and replaced with the proposed big game security amendment? We posit that there is none and that the current proposal to change the standard for big game security has been designed at a conference table over the past couple of years, with no supporting field research or testing. The very plausible reason for this approach is that the Helena National Forest has failed, over the past 28 years since the Helena Forest Plan was adopted, to apply and adhere to the existing security standard. Instead, the Forest has determined repeatedly for landscape altering projects that there would be "No Significant Impact". As a result, the Helena National Forest has finally arrived at the day of reckoning. In fact, they cannot comply with their own standards now because they have failed to do so incrementally over the past 28 years. The "Decision Notice and Finding of No Significant Impact" for the Forest-wide Hazardous Tree Removal and Fuels Reduction Project, signed August 23, 2010 by Supervisor Riordan is just one of hundreds of projects that have been similarly issued over the past 28 years. The Decision stated: "An alternative that was considered but eliminated from detailed study was one that addressed the road density issue raised from the public. These comments came	

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during the Objection period. Some comments suggested the Responsible Official should consider an alternative that would reduce open road densities as a means of increasing elk security. With this proposal not being a travel management decision, this proposed alternative is outside the scope of the decision space and analysis."(Hazard Tree Project DN, August 2010). The decision that was made to "treat" many roads in remote settings influenced the subsequent Travel Plan and the functionality of the big game security and habitat effectiveness standards, but failed to address those impacts. The analysis conducted for the Hazardous Tree Project clearly reveals that all the Elk Herd Units that were meeting Forest Plan Standard 4a for big game security were in and near roadless areas, including Nevada Mountain, Jericho, Little Blackfoot, and Bison Mountain. All of these Inventoried Roadless Areas (IRAs) occur on the Divide Landscape and emphasize the importance of IRAs to Elk Herd Unit security. The rationale for "clearing" old routes within these roadless areas was unjustified as indicated by the lack of compliance with the security standard and the fact that other areas that do not occur in or near roadless areas do not meet the existing security standard. This is not to say that areas not having roadless areas cannot meet the standard. However, the Helena National Forest will simply need to limit road densities in these areas. Appendix C of the Divide DEIS (page 17) indicates that even for Alternative 3, one herd unit would remain below the 30% threshold, but then goes on to say all six EHUs would meet the 30% standard. That in fact is not the case – one would not meet the standard. Measures should be taken to raise all EHUs above the minimum 30% security level. Elk have been used as a surrogate, or Management Indicator Species, for the needs of other ungulates (mule deer, white-tailed deer, and moose). However, for a variety of behavioral and nutritional reasons elk do not reflect the needs of other ungulates. While elk herd numbers have often risen over the years because they are	

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so mobile and move off of National Forest lands when it becomes insecure, deer and moose do not. Currently in Montana, mule deer, white-tailed deer, and moose populations are at serious lows. These are species whose movements are much more limited than that of elk. This is not a time to be eliminating the forest cover component from the big game standards. It is time for restoration of the landscape. The landscape and wildlife will begin to heal if an aggressive travel plan is implemented so a return to the time-tested "best available science" of the existing big game security standard can be restored. Roadless Areas Compliance with the Roadless Rule must be demonstrated. That compliance includes providing "lasting protection" for IRAs in the project area. These IRAs are characterized by high quality, undisturbed soil and water and a diversity of plant and animal communities. According to the USFS, these IRAs "provide clean drinking water and function as biological strongholds for populations of threatened and endangered species . . . [and] large, relatively undisturbed landscapes that are important to biological diversity and the long-term survival of many at risk species." (66 Fed. Reg. at 324). These IRAs also "provide opportunities for dispersed outdoor recreation, opportunities that diminish as open space and natural settings are developed elsewhere. They also serve as bulwarks against the spread of non-native invasive plant species and provide reference areas for study and research." By law, these biological strongholds are to be managed for "lasting protection." In adopting a proposed action the USFS: (1) must comply with the Roadless Rule and manage these areas for lasting protection; and (2) should prohibit and/or restrict all motorized access in the IRAs. Jericho Mountain is an Inventoried Roadless Area (IRA). It should be returned to a roadless status. The Divide Landscape is extremely fragmented with private in-holdings in Banner, Monitor, Minnehaha, and Telegraph Creeks. Roads that have	

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been created in roadless areas should be removed to improve the landscape integrity. The Bison Mountain Inventoried Roadless is known to have denning grizzly bears and wolverine. Yet, over-snow vehicles can use Road 1801 which traverses the Bison Mountain Area (Electric Peak Roadless Area) in Alternative 3 and 4, but is currently closed to snowmobiles in Alternative 1. The Helena National Forest should maintain the existing condition of no over-snow motorized vehicles by keeping Road 1801 closed. Within meters of the Bison Mountain IRA, Road 495-D1 was sanctioned for "treatment". This road connects to the CDNST that has restrictions of 50" or less, yet 495-D1 is open to highway vehicles year- long even though it does not connect to any road that is currently open to motorized vehicles. Road 495-D1 is a clear example of a road that was included in the Hazardous Tree Removal Project, deep in the National Forest next to an IRA, but didn't provide a hazard to anyone. Yet Road 495-D1 has been or will be "treated" by removing trees along its length, grading and possibly gravelling. This was an action that was not necessary and was pre-decisional to the Divide Travel Planning process. Other roads not occurring within the Wildland Urban Interface that are slated for Hazardous Tree Removal treatment prior to the Divide Travel Planning process were also pre-decisional and cumulatively impacted big game security, leading the Helena National Forest to declare that they could not meet the standard for big game security. This recurring situation has led to the Catch-22 situation wherein the Forest has chosen not to meet the big game security standard, but then devised a new standard that would not limit either timber removal or motorized travel. The harsh truth is that the Helena National Forest cumulatively ignored its own valid, scientifically based standard for nearly three decades. The Nevada Mountain Inventoried Roadless Area supports grizzly bears, wolverine and lynx. While doing aerial wildlife surveys as a wildlife biologist for Montana Fish, Wildlife and Parks, Gayle Joslin observed wolverine tracks and excavation holes on Nevada Mountain. HHAA board member, Gary Ingman, has personally observed wolverines within the Nevada Mountain Roadless Area on three occasions	

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and typically see their tracks annually. In Alternatives 2 and 4, Road 4044-E1 goes deep into the Nevada Mountain Inventoried Roadless Area. This route dead-ends after crossing through an area restricted to over-snow motorized vehicles and penetrates about 1.5 miles into the IRA. None of the action alternatives adequately address massive road duplication to the south of the Nevada Mountain IRA. These roads inhibit linkage between the Nevada Mountain Roadless Area along the Continental Divide to and south of Highway 12, thus hindering movement of wildlife between ecosystems. A total of 22.59 miles of roads that were stamped for Hazardous Tree Removal in 2010, prior to this 2014 Divide Travel Plan, but which failed to meet the standards for "hazard" under the Wildland Urban Interface include Roads 1863, 607, 293, 293-A1, 296, 296-B1, 4196, 1892, 485-D1, 601-F1, 601-K2, 601-K3, and 601-K4. Another 18 roads (36.44 miles) were slated for "treatment" next to inventoried roadless areas during the Hazardous Tree project even though the trees were not a hazard to anyone (Roads 607-H1, 123, 495-D1, 1834, 1834-C1, 1834-D1, 296-A1, 296-A2, 296-A3, 1830, 1831, 329-E1, 1838-E2, 1838-F1, 4135, 601-D1, 601-E1, and 601-J1). This was simply an expeditious move on the part of the Helena National Forest to improve roads for future projects without having to go through the travel planning process. The Helena Hunters and Anglers Association objected to this approach, but their objection was denied by the Regional Office of the Forest Service. In addition, the Hazard Tree Removal project concluded that the big game security standard could not be achieved during that project, so the Forest Supervisor simply exempted the Helena National Forest from adherence to Forest Plan Standard 3 (summer hiding cover) and 4a (big game security), as follows: "As part of my Decision I am amending the Forest Plan through a site-specific Forest Plan amendment for this project. Analysis for this project indicated the need for a site-specific Forest Plan amendment to the Helena Forest Plan regarding elk	

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summer and winter range and big game security… As part of my Decision I am also making a site-specific amendment to the Forest Plan. This amendment exempts this project from the Forest Plan big game standards 3 and 4a." There was no actual amendment to Forest Plan wildlife standards 3 and 4a. The amendment was simply an exemption from compliance with the Helena Forest Plan by the Helena Forest Supervisor. Water Quality The following streams within the Divide Travel Planning Area have been identified by Montana DEQ as having water quality impairments due to sedimentation/siltation stemming from forest roads and/or silvicultural activities: Little Prickly Pear Creek from the North and South Forks to Clark Creek (23.9 miles) Tenmile Creek from the headwaters to Spring Creek (6.72 miles) and from Spring Creek to the Helena Water Treatment Plant (7.32 miles) Little Blackfoot River from the headwaters to Dog Creek (22.54 miles) Telegraph Creek from the headwaters to Hahn Creek (5.35 miles) Elliston Creek from the headwaters to mouth (4.95 miles) Dog Creek from the headwaters to Meadow Creek (4.33 miles) Trout Creek from the headwaters to mouth (11.5 miles) Snowshoe Creek from the headwaters to mouth (11.45 miles) The above list is not all inclusive for streams within the Divide Travel Planning Area. Montana DEQ has developed sediment Total Maximum Daily Loads (TMDLs) for all of the above streams except Little Prickly Pear Creek. The Tenmile Creek sediment TMDL was completed in 2006, while sediment TMDLs for the Little Blackfoot River and the above listed tributaries to the Little Blackfoot were completed in 2011. DEQ assessed sediment delivery to the subject streams from open unpaved roads using GIS, field data collection, and sediment modeling	

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techniques. The most significant source of road sediment loading was linked to unpaved road crossings. DEQ determined reductions in sediment loading from unpaved roads that are needed to attain water quality standards for each of these streams as a component of the TMDLs. The stated prescription for attaining the sediment load reductions includes the application of road sediment best management practices (BMPs) and road closure or abandonment, where appropriate. For the Little Blackfoot streams, targeted percent reductions in sediment delivery from unpaved roads are as follows: Little Blackfoot River – 71% reduction Telegraph Creek – 71% reduction Elliston Creek – 70% reduction Dog Creek – 70% reduction Trout Creek – 76% reduction Snowshoe Creek – 74% reduction As a primary landowner in these watersheds, the Helena National Forest has a responsibility to help attain the targeted reductions in road sediment loading established in the TMDLs. Travel management, and especially road closures and decommissioning, is an effective tool for reducing sediment loading to streams from unpaved forest roads. The Helena National Forest should select an alternative for the Divide Travel Planning Area that appropriately minimizes the miles of open motorized travel routes within these sediment impaired watersheds in order to improve water quality and attain full support of the streams' designated beneficial uses. As the Divide Travel Plan EIS is finalized, we ask that you fully address Helena National Forest water quality conditions and where and how sedimentation would be curtailed and TMDL standards met under each of the 4 alternatives. Please specify actions that are planned to fully rectify human-caused sedimentation and other water pollution problems across the Divide Travel Plan landscape. Of the 23 stream segments sampled for percent fines in gravels (Table 3.31 of the	

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DEIS), all but one (North Fork Ophir Creek) exceeded reference levels – in some cases by 100%. The alternative having the least amount of motorized routes would help reduce sediments, and along with restoration activities, would be the most cost effective approach to improving the water quality. The Forest Service maintains jurisdiction on about 58.6 miles of high risk roads (page 213 of the DEIS). Under action Alternative 3, about 27.98 miles of high risk Forest Service roads would remain open and 30.66 miles (17.32 miles currently closed plus 13.34 proposed miles) or 52% would be closed to wheeled motorized vehicle use. Private and county roads account for the balance of high risk roads, or about 19.8 miles. These non-Forest Service roads represent an ongoing cumulative impact to the surface water quality in the planning area. With approximately 378 stream-road intersections (crossings) in the planning area, the Forest Service has jurisdiction on 288 crossings. About 142 forest road crossings (49%) would be closed under Alternative 3. Additionally, nine dispersed campsites associated with high risk roads are located directly adjacent to TES fish habitat, and six of these would close under this alternative. The other three dispersed recreational campsites would remain open to public use and would continue to potentially adversely affect TES fish habitat without mitigation measures. Six currently open fords on TES fish streams would experience permanent or temporary closures to reduce the risk of direct mortality to westslope cutthroat trout and bull trout. A seventh closed ford located in the Ontario Creek drainage would remain closed to wheeled motorized traffic. Page 218 of the DEIS states that currently there are approximately 58.6 miles of high risk roads and 288 crossings under Forest Service jurisdiction throughout the planning area. Under the No Action Alternative, 17.3 miles (30%) of high risk roads and 94 (33%) of crossings are currently closed to wheeled motorized vehicle travel. Alternative 3 is the most beneficial alternative with respect to needed water quality improvements associated with sedimentation because it has the least number of stream crossings (146 open crossings), and the least miles of sediment producing roads with 28 miles open and 30.6 closed. This translates into eight fewer crossings	

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and 1.6 new miles of closed high risk roads. Although Alternative 3 appears to be the best of the offered alternatives, it seems there could be an improved alternative offered to further reduce the extent of human caused sedimentation that would be generated from 146 open stream crossings and 28 miles of open road in Alternative 3. Even in the best alternative, this still amounts to 50.7% of the damaging stream crossings, and 47.8% of the high risk roads being open to motorized travel. Please provide an improved alternative that better addresses the well documented and widespread sedimentation problems in the Divide Travel Planning Area and meets the intent of the completed and approved TMDLs. Individual Road Recommendations General Comments and Questions See comments regarding Road 227-B1 and all other roads that have been "Closed to motorized vehicles year-long, including over-snow motorized vehicles" (gold lines over roads in Alternative 1). We question what constitutes an over-snow vehicle and whether there is a minimum amount of snow that must be on the ground to travel on it. Adequate signage and physical barriers are essential to prevent illegal use of roads designated for closure. Decommissioning must be considered in certain cases. Such actions must be part of this proposal, but currently are not. The Divide Travel Plan public notice in the March 18, 2014 Independent Record, states: "The DEIS would include only open or closed determinations; decommissioning would not be specified in this decision." We wonder why this limitation is being imposed on the Divide Travel Planning area when it was not imposed on the Blackfoot Travel Planning area in either the Draft or Final EIS, when arguably the Divide area needs more attention and restoration than the Blackfoot. We request that decommissioning be allowed as a tool in Divide Travel Plan implementation. Road decommissioning and removal must be available tools to address landscape recovery. The Divide Landscape does not compare to many other less impacted, less damaged areas of the Northern Region that have not been as affected by mining,	

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logging, roading, damaging motorized use, and thus requires more attention in bringing it back to a more healthy, naturally functioning status. A failing landscape is one that is experiencing severe water quality issues, diminished fisheries and wildlife services in terms of habitat quantity and quality, movement, and population structure. The Divide Landscape is verging on such a place. However, responsible, assertive stewardship can go a long way to recovering this portion of the Helena National Forest on the edge of the capitol city, along the Continental Divide, and linking the Yellowstone and Northern Continental Divide Ecosystems. As tattered as the Divide is, the Helena City Commission recognized its value when it passed Resolution 2008-57 entitled, Resolution to Protect and Promote Conservation of Wildlife Habitat and Corridors along the Continental Divide. The 2006 Helena National Forest Travel Map, signed by supervisor Kevin Riordan on May 1 does not show many roads that appear on Alternative 1. Opening such roads for motorized use is not responsible management in a landscape that has severe water quality and wildlife security issues. Area-Specific Road recommendations Clancy-Unionville Area - Interface with Clancy-Unionville Travel Plan The Clancy-Unionville Vegetation Manipulation and Travel Management Project Record of Decision was signed in February 2003 by Helena National Forest Supervisor Thomas Clifford. That decision specifically does not provide for motorized routes from the Clancy-Unionville area to the Divide. Chessman: Roads 4009-A1 and 4009-B2 – These should be kept closed to motorized vehicles year-long, including to over-snow vehicles. This area is used by moose year-long and is spring elk calving area. It crosses into the Clancy-Unionville Travel Area and is closed year-long to all motorized vehicles via the Record of Decision issued in 2003. All action Divide alternatives open this route. This is not acceptable to the Clancy-Unionville Citizen's Task Force (K. Lloyd, President, pers. com.). The Clancy-Unionville Citizen's Task Force worked in concert with the Helena Ranger District during the entire Clancy-Unionville Travel Planning process, even going so far as to develop a citizen's travel plan alternative	

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for the EIS. Several HHAA members also are members of the Clancy-Unionville Citizen's Task Force. Red Mountain: Close Road 299-G1 and the parallel Road 299-A1, Road 299-I1 and all roads associated with the Chessman flume project. Banner Creek: Close Road 1876-A1 from NW ¼ Sec 16 (8N, 5W) to SE ¼ of Sec 16. Private land accessed from Road 1876-B1 – Open ¼ section to access private land in SE ¼ Sec 16. This will reduce road mileage but still serve private land needs. Jericho Mountain This is an Inventoried Roadless Area. It should be returned to a roadless status. The Divide is extremely fragmented with private in-holdings in Banner, Monitor, Minnehaha, and Telegraph Creeks. Roads that have been created in roadless areas should be removed to improve the landscape integrity. Close the following: Un-numbered road in center of Sec 23 T9N,R6W that is open to over-snow vehicles 12/2-10/14 in Alternatives 1 and 2 (closed in Alternatives 3 and 4). In inventoried roadless area: Roads 1863, 1863-E1, and 527-B1. Road 1856-B1 provides access to private land with no public access. Closure of Road 1856-D1 would add substantially to big game security. It is unclear what this number, Road 1856-J1, refers to on the map. What decision process allows Road 527-C1 to be constructed into the Jericho Mountain IRA? This route up Moose Creek does not appear on the 2006 Travel Map. Now the route is open to over-snow vehicles. This is elk, moose, and deer winter range. Bison-Negro Mountain Bison Mountain inventoried roadless area occurs within this area. Maintain Existing Conditions, which is "Closed year-long to all motorized use": Roads 1801, 1801-A2, 1801-A3, and 1801-A1. Road 1801 is allowed to traverse the Bison Mountain Roadless Area in Alternative 3	

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and 4, but is currently closed to snowmobiles in Alternative 1. Maintain the existing condition of no over-snow motorized vehicles. Denning grizzly bears and wolverine are known to be in this area. Maintain Existing Condition: "Closed to all but snowmobile use": Road 1104-A2. All action Alternatives would open this to wheeled motorized use. Please do not change the existing condition. Close Road 495-D1. This road connects to the CDNST that has restrictions of 50 inches or less, yet Road 495-D1 is open to highway vehicles year-long even though it does not connect to any road that is currently open to motorized vehicles. Alternative 3 should offer closure of this road which would substantially enhance wildlife security. Road 495-D1 is a clear example of a road that was included in the Hazardous Tree Removal Project, deep in the National Forest next to an IRA, but didn't provide a hazard to anyone. Yet Road 495-D1 has been or will be "treated" by removing trees along its length, grading and possibly graveling. This was an action that was not necessary and was pre-decisional to the Divide Travel Planning process. There are other roads not occurring within the Wildland Urban Interface that have been slated for Hazardous Tree Removal treatment prior to the Divide Travel Planning process and thus were also pre-decisional and cumulatively impacted big game security. A list of roads that were stamped for hazardous tree removal prior to a travel plan decision, but which failed to meet the standards for "hazard" under the Wildland Urban Interface have been included in our earlier comment letter (Roads Analysis 3rd – Divide Landscape, Hazardous Tree Removal/Issues/HHAA). Close Road 495-D1. Road 227-B1 listed as Charter Oak is shown on the Existing Condition (Alternative 1) map as "Closed to motorized vehicles year-long, including over-snow motorized vehicles. We maintain it was pre-decisional and in violation of the existing travel plan when in 2010 this road was sanctioned for "treatment" through the Hazardous Tree Removal Project. Now all Action alternatives in the Divide Travel Plan would "open this road to over-snow vehicles 12/2-5/15. Keep Road 227-B1 closed – if it has been open to now, this has been a clear and known violation of the Travel Plan.	

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Telegraph Road 1863-B1 is a short dead-end and should be closed. These private parcels have access already via Road 1859 so close Roads 527-A1, 527-A2, and 495-C2. Treasure Mountain: A plethora of roads show as open for highway vehicles in the existing Alternative 1. However they do not show at all on the 2006 signed Travel Plan. This is not legal. The following roads did not exist on the 2006 travel map and should be closed now: Roads 1857-B3 and 1857-008. Road 1857 parallels the main Little Blackfoot Road less than a half mile to the east for more than three miles. This duplication should be avoided. Illegal OHV use of a pioneered trail around Slate Lake would continue in the absence of effective enforcement. If this use were eliminated, the Slate Lake area would serve as a non-motorized focal area for wildlife year-round. Limburger Springs The Limburger Springs area is in known big game winter range. The following should be closed in all Alternatives (1, 2, 3, 4) to over-snow vehicles: Roads 314, 314-J1, and 314-J3. Only Alternative 1 retains an over-snow vehicle closure on winter range during the hunting season. This closure should be retained in all alternatives. Close this route in the calving area: Roads MTR 501 and 503. All of these are dead-end roads in winter range so close Roads 314-G1, G2, H1, I1, I2, and J5. These routes are dead end spurs and should be closed: Roads 314-D1, F1, and K2. Sweeney Creek-MacDonald Pass The Sweeny Creek area is rocky, well-watered and heavily timbered. It provides over 7,000 acres of high quality wildlife habitat that extends to the east from the Continental Divide. This area should have been inventoried as roadless but for some reason was never classified as such. It contains important elk calving and summer range, and security cover during the big game season. In the cold months	

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the south facing slopes of Sweeny provide winter forage for mule deer, elk and moose. Sweeny provides important big game security along a part of the Divide Landscape that is otherwise heavily fragmented by roads. "Alternative 1 maintains existing condition. A 12-mile maze of motor trails produces a local open trail density of 2.9 mi/mi². There are no seasonal restrictions, and snowmobiles use the trails when snow is adequate. The northwest end of the area and adjacent slopes provide prime winter range for big game animals. Motorized activity in this part of the area from mid-fall through mid-spring is a serious disruptive influence." (DEIS Appendix C-25) The numerous motorized routes in Sweeny Creek are all illegal user-created routes. No NEPA evaluation has been done on any of these routes. They need to be physically closed, reseeded and fully reclaimed. The cluster of illegal spur roads emanating from the Priest Pass Road must be physically closed and reclaimed. A number of these spur roads cross live streams or are located in wet aspen/dogwood riparian habitat. Uncontrolled firewood cutting is starting to impact the aspen stands along the Priest Pass road. This area has always been recognized as important mule deer winter range. Both Alternatives 3 and 4 would finally close it to wheeled motorized vehicles and also recognize it as a winter area closure. This move is strongly encouraged, and if implemented would finally accommodate the requests of MFWP that were made in 1991 to create a motorized area closure for Sweeney Creek to protect critical mule deer, elk, and moose winter range, as well as limited old growth ponderosa pine habitat for sensitive species including pileated woodpecker and flammulated owls (MFWP correspondence 1991). In fact, one of the rationales for the Sweeney Creek timber sale was to enhance bitterbrush production on the winter range. This project then extended into the Porky-Roundwood timber sale of 1995. Recognition of a year-long area closure is due and appreciated. No alternative closes Road 1802-B2 to over-snow motorized travel, yet this road accesses the non-motorized winter area and the Continental Divide linkage zone in this immediate area is known to be used by lynx, wolverine, and wolves. Greenhorn	

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Close Road 1853-C1. This leads to an unauthorized road and two other open roads parallel it. Road 1853-D2 is a short dead-end route in a cluster of roads and is closed in Alternative 3 but should be closed under all options. Numerous (non-system) user created routes in the Greenhorn Mountain area were identified by the Helena National Forest watershed team. These routes must be physically closed and reclaimed. Dog Creek Currently there are 10 road segments – all open in all Alternatives and not necessary for transportation in Sec 34 T11N R6W. Close Road 1855-A2. Close and decommission the spur to the southwest off of Road 1855-A1 in Sec 27. Close all "yellow" unauthorized routes everywhere. Decommission the short dead-end Road 622-G1. A rat's nest of roads occurs north of Greenhorn Mountain. Decommission/remove to improve linkage zone along Continental Divide: Roads 1853-A1, C1, B3, B4, D2, and E1. Leave open Roads 1853 and 1853-D1. Close Road 1851 since it encourages traffic to unauthorized Road 202. If necessary, provide a private access route with a special use permit to the inholding in Sec 15. This is an important Continental Divide linkage area. The following encourage incursions into the Blackfoot Winter Travel Plan closed area and are dead-ends: Road 774 and all spurs. Very short dead-end road on the Continental Divide: Close Road 4036-A. Ophir Creek Road densities are extreme. All roads marked for closure in Alternative 3 and 4 should be done but in addition, several dead-end roads parallel each other and are currently left open but should be removed: all Road 708 spurs except the main, Road 571-C1, remove all spurs of Roads 4005, 4006, 571, and 1855. In Alternatives 2 and 4, Road 4044-E1 goes deep into the Nevada Mountain Inventoried Roadless Area where both wolverine and grizzly bears are known to den. While doing aerial wildlife surveys, we have seen wolverine tracks and den	

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holes on Nevada Mountain. This route dead-ends after crossing through an area restricted to over-snow motorized vehicles and penetrates about 1.5 miles into the IRA. None of the action alternatives adequately address the massive road duplication in this area, which inhibits linkage between Nevada Mountain Roadless Area along the Continental Divide to and south of Highway 12, thus hindering movement of wildlife between ecosystems. Alternatives Alternative 1 – Existing Condition/No Action Alternative 1 would retain the existing condition, which in many cases is friendlier toward water, soil, and wildlife resources in that dozens of miles of roads that would be opened in the other three action alternatives would remain closed on a year-long basis. All "yellow" roads on the Alternative 1 Travel Map are designated closed year-long, but most of these in the other alternatives would be opened to some type of motorized use, even in Alternative 3. Alternative 1 is the only alternative that would retain the closure to over-snow vehicles in the Limburger Springs area winter range so they could not be used during the hunting season. Alternative 1 is clearly more winter friendly to lynx and wolverine than the other alternatives with 31,350 acres open, while Alternatives 3 and 4 would allow 44,980 acres to be open to over-snow vehicles. Alternative 1 would retain the existing Forest Plan Big Game Security Standard (involving a matrix of road density and vegetative cover – all action alternatives would remove all vegetation cover requirements) and would not implement the proposed security amendment. The proposed amendment would remove all vegetation cover requirements for big game security. Alternative 2 – Maximum Motorized Use This Alternative does try to rectify on-going natural resource problems but would exacerbate these problems with the maximum motorized use. Alternative 3 – Most Natural Resource Friendly	

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Of the three action alternatives, Alternative 3 is generally the best choice for natural resource concerns, but it does not go far enough and could be improved upon with certain site-specific alterations described previously. It allows more winter motorized travel than Alternative 4, and would allow snowmobile use on the previously designated winter ranger in the Spotted Dog-Limburger Springs area. Winter range in this area should be identified on the Travel Map. Off-route over-snow use would increase in this alternative over the existing condition from 31,350 to 44,980 acres. These limitations should be corrected. Alternative 3 is the best of the offered alternatives for grizzly bear, elk, and mule deer. Lynx would be better served with over-snow use at existing levels (Alternative 1, Appendix C-18). Alternative 3 reduces open road density from to 0.1 mi/sq mi, so is clearly the best option for key areas including Baldy Ridge-Spotted Dog-Kading. Alternative 4 – Helena National Forest Proposed Alternative/Combination of Alternatives 1, 2 and 3 From a natural resource perspective, Alternative 4 is an improvement over Alternative 2 but not Alternative 3, and only in some cases is it better than the Existing Condition (Alternative 1). It does not recognize winter motorized closures. It designates additional motorized trails, highway vehicle use roads, and longer motorized use periods. It does not recognize the Blackfoot-North Divide Winter Travel Plan restrictions to over-snow motorized vehicles. Alternative L – Landscape Restoration This alternative would allow for reasonable recreational motorized use but maximize implementation of authority, regulations, and executive orders to restore, preserve, and protect water quality, soil and vegetation health, fish and wildlife habitats, and healthy ecosystem function and resilience. Cumulative Effects Thank you for listing some of the projects conducted in the Divide Travel Planning Area. We would ask that you also include the decision process that was used for each project. Decision notices, RODs, and other decisions associated with these	

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projects will describe stipulated mitigation (and other) measures that were or should have been implemented since the Forest Plan was adopted in 1986. We noticed that not all activities are listed, including the Sweeney Creek or the subsequent Porky-Roundwood timber sales. This area has been particularly damaged by motorized use subsequent to those actions. In addition, inconsistent information about the projects is provided. For example, the acreage and board feet of timber removal are not listed for the Hope/Snowshoe, Ophir Creek and Cave Gulch timber sales, or the Hazardous Tree Removal project which involved "treatment" of 491 miles of road on the Helena National Forest. Please provide this missing information in the final EIS. Not all timber projects listed in Appendix B include the acreage involved. In addition to the 1,352 acres that have been "treated", there is the 6,335 acre Telegraph Creek treatment area, and the 491 miles of road in the Hazard Tree Project (9,415 acres or nearly 15 square miles) (Table 2, Soils Report, Hazard Tree Project). These projects total at least 26.7 square miles of the Helena National Forest. Cumulatively, a 27 square-mile area of timber removal cannot be considered as having "no significant impact." Clearly there has been little effort to maintain or adhere to Forest Plan Standard 4a for big game security. This inconvenient truth does not absolve the Helena National Forest from its responsibility to work to restore this science-based standard. A list of roads that were stamped for Hazardous Tree Removal in 2010, prior to this 2014 Divide Travel Plan, but which failed to meet the standards for "hazard" under the Wildland Urban Interface were submitted with our earlier comments (Roads Analysis 3rd – Divide Landscape, Hazardous Tree Removal/Issues/HHAA). In the case of the Hazardous Tree Removal Project, the Helena Forest Supervisor decided in the Decision Notice and Finding of No Significant Impact: "As part of my Decision I am amending the Forest Plan through a site-specific	

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Forest Plan amendment for this project. Analysis for this project indicated the need for a site-specific Forest Plan amendment to the Helena Forest Plan regarding elk summer and winter range and big game security… As part of my Decision I am also making a site-specific amendment to the Forest Plan. This amendment exempts this project from the Forest Plan big game standards 3 and 4a." There was no actual amendment to Forest Plan wildlife standards 3 and 4a -- the amendment was simply an exemption from compliance with the Helena Forest Plan by the Helena Forest. There is concern that measures to protect natural resources and abide by wildlife standards and guidelines have not been consistently applied as per these decisions. Cases in point would be all the roads and trails that appear on the existing condition Alternative 1 map, but do not appear on the 2006 Travel Map, or now (as per Alternative 1) have broader use periods than what appears on the 2006 Travel map. Timber sale projects such as Sweeney Creek, Mullan Pass, Hope/Snowshoe, Lava Mountain, etc. had associated decisions that may not have been fully followed. For example it took more than a decade to implement road decisions for the Lava Mountain sale, and then only because the public objected to new timber sale action unless the earlier stipulations regarding road closures at Lava Mountain were completed. Also, Roads 335-A1 and 335-A2 on the south side of the Priest Pass road were closed for big game security after timber removal in the 1980s. Despite ongoing and increasing illegal motorized trail pioneering in the area (note the Helena National Forest watershed group identified "non-system" routes), several Divide Travel Plan alternatives call for opening Roads 335-A1 and 335-A2, inviting further motorized incursion into secure big game hiding cover. These roads were closed as part of past NEPA-reviewed forest management activities and must not be used as "bargaining chips" during the present travel planning process.	

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If decisions and stated rationale behind those decisions are not followed, the consequences cumulatively add up to impacts on natural resources. Such cumulative actions, many of which had associated decisions of No Significant Impact, also are the reason that Forest Plan amendments are now being proposed – because they cannot, through their own doing – meet the Forest Plan standards. This behavior does not justify throwing out the scientifically-based big game standard for security. Another example was the proposed Biathlon Project which received a No Significant Impact finding by the Helena National Forest (June 12, 2008), but was challenged in court and was remanded to the Helena National Forest based in part on inattention to wildlife linkage/connectivity, cumulative impacts, wetlands, elk standard for hiding cover, among other things. We believe the Helena national Forest must be accountable to past decisions, and through future actions the Helena National Forest has the means to rectify past management oversight or actual transgressions. We welcome the opportunity to work with Forest personnel to help identify and promote restorative stewardship projects for natural resources. Monitoring, Enforcement, and Schedule Monitoring "Overwhelmingly, scientists agree that in absence of monitoring, a project may be rendered invalid. While funding for monitoring is almost universally short of what is required to address scientific and technical uncertainties, monitoring is the only way to understand short- and long-term effects of restoration actions."4 At the April 1, 2014 meeting of HHAA the Lincoln District Ranger for the adjoining Blackfoot Travel Planning area stated that because financial resources are limited, it would take years to implement that plan. In the meantime, she stated that all roads that are currently open would remain open. She did not say that all roads that are	

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currently closed would remain closed or that any enforcement would occur. She stated that monitoring and enforcement is a partnership between the USFS, MFWP, and the public. Of course the public has no authority to enforce anything, thus essentially divesting the USFS of the responsibility to monitor and enforce. We are concerned that this same situation should not be repeated in the Divide Travel Planning Area. Enforcement Positive feed-back loops to correct problems on the ground seem to be very limited, only occurring through site-specific emergency orders. Please identify and communicate the steps that must be taken for the public to request and document the need for an emergency order. The Divide DEIS acknowledges serious enforcement deficiencies. An active enforcement presence must be guaranteed. What is the point of having a Travel Plan if it is not enforced? How will the ROD address this very serious issue within the Divide Landscape? Just one example: "Illegal OHV use of a pioneered trail around Slate Lake would continue in the absence of effective enforcement." (Appendix C-25) Existing travel restrictions up to 2014 have not been enforced for years on the Helena National Forest. Recently the new Helena Forest Supervisor signed emergency orders to require enforcement of the existing (2006) travel plan. What will be the requirements and time frame for enforcement of this new travel plan once it is signed into law? Schedule Fundamental to a functional Travel Plan is an implementation schedule on the order of 5 years or less. Please provide a schedule in the ROD that speaks to site-specific implementation of all actions associated with the Travel Plan. We request expeditious implementation of road closures, decommissioning, and removal (re-vegetation in some cases).	

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Recommendations We encourage you to fashion a modified alternative that will bring the Divide Landscape, to which this travel planning process is being applied, to a responsible restored condition. HHAA members are interested and willing to provide volunteer labor to assist the Helena Ranger District with closing illegal trails, rehabilitating user-created routes, and posting travel management signs. Our membership is also looking forward to helping the Helena Ranger District monitor compliance with this travel management decision. Thank you for addressing these concerns and considering these suggested modifications to the final alternative. Sincerely, Stan Frasier, President Helena Hunters & Anglers Association 1 Joslin, G., and H. Youman's, coordinators. 1999. Effects of Recreation on Rocky Mountain Wildlife – A Review for Montana. Committee on effects of Recreation on wildlife, Montana Chapter of The Wildlife Society. 307pp. 2 Canfield, J. E., L. J. Lyon, J. M. Hollis, and M. J. Thompson. 1999. Ungulates. Pages 6.1– 6.25 in G. Joslin and H. Youman's, coordinators. Effects of recreation on Rocky Mountain wildlife: a review for Montana. Committee on Effects of Recreation on Wildlife. Montana Chapter of The Wildlife Society. 3 Lyon, L. Jack, USDA Forest Service, Intermountain Forest and Ranger Experiment Station; Terry N. Loner and John P. Weigand, Montana Department of Fish, Wildlife and Parks; C. Les Marcum and W. Daniel Edge, Forestry School, University of Montana; Jack D. Jones and David W. McCleery, USDI Bureau of Land Management; Loran L. Hicks, Plum Creek Timber Company, inc. Coordinating Elk and Timber Management – Final Report of the Montana	

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Cooperative Elk-Logging Study, 1970-1985. 53pp. 4 Febrile Van Cleve, University of Washington; Charles Simmental, University of Washington; Fred Goetz, U.S. Army Corps of Engineers; Tom Mumford, Washington Department of Natural Resources. May 2004. Application of the "Best Available Science" in Ecosystem Restoration: Lessons Learned from Large-Scale Restoration Project Efforts in the USA. Prepared in support of the Puget Sound Near shore Partnership (PSNP). Lessons Learned from Large-Scale Restoration Efforts in the USA. Technical Report 2004-01. 30p.	
(46) Received: May 28, 2014 Dear Sir or Madam: I write this letter in support of the Nevada Mountain Proposed Wilderness, the Electric Peak Wilderness, and the non-motorized prescription in Alternative 3. Over the last seven years of my life I have lived in the Western states. The one and only state that draws me back is Montana. Currently I reside in Colorado and it fails utterly in comparison to Montana. Montana's most valuable resource is its wild lands. These are the places people dream of and the things people wish to experience; blue ribbon streams, herds of elk, high alpine lakes, million acre wilderness areas, grizzly bears, old growth forests, and frontier lifestyle. No other place in the lower forty-eight can compare to this. There is no place for motorized use in these special places in Montana. I urge you to support the creation of these wilderness areas, and to promote non-motorized use in the other associated areas. (46-1) We must not make the mistakes of previous people. Wild land is a precious resource in which we cannot recreate. Thank you for listening, Zachary Cardosi (815)549-3139 zmcardosi@gmail.com	(46-1) Recreation – Thank you for your comment – Zach has provided 4 letters that are all similar to each other. One response for all should address his concerns. My want to respond by talking about the differences in alternatives and which one provides the most protection for his areas of interest.

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(47) Matthew Bishop Western Environmental Law Center 103 Reeder's Alley Helena, MT 59601 406-324-8011 406-443-6305 FAX bishop@westernlaw.org www.westernlaw.org May 29, 2014 Sent via e-mail Helena National Forest Attn: Divide Travel Plan 2880 Skyway Drive Helena, MT 59602 FS-comments-northern-helena-helena@fs.fed.us Re: Helena Hunters and Anglers Association's comments (supplemental) on the Helena National Forest's proposed amendment to big game standard 4(a) in the Helena Ranger District. The Western Environmental Law Center (WELC) hereby provides these timely comments on the Forest Service's (Service's) draft EIS (DEIS) for the Divide Travel Plan which includes a programmatic plan amendment to big game standard 4(a) in the Helena National Forest Plan (hereinafter the "proposed amendment"). These comments are submitted by WELC on behalf of the Helena Hunters and Anglers Association (hereinafter "Helena Hunters"). These comments are submitted in addition to earlier comments already submitted by Helena Hunters (Gayle Joslin). These comments merely supplement and do not replace Helena Hunters' earlier comments	

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Helena Hunters' members live, work, and recreate on the Helena National Forest and several of the organization's members are intimately familiar with the Helena Ranger District and Divide Travel Planning Area in particular. Helena Hunters' membership is made up of professionally trained natural resource managers. They are now or have previously worked in the fields of fish, wildlife, forestry, recreation management, water quality, and environmental assessment. Helena Hunters' mission statement is commensurate with stated management objectives for the Helena National Forest: "The Helena Hunters and Anglers Association is dedicated to protecting and restoring fish and wildlife to all suitable habitats, and to conserving all natural resources as a public trust, vital to our general welfare. HHAA promotes the highest standards of ethical conduct and sportsmanship, and promotes outdoor hunting and fishing opportunity for all citizens to share equally." The following discussion itemizes Helena Hunters' comments on the proposed amendment to big game standard 4(a) in the Helena Ranger District. (1) Best available science. NEPA and the Service's planning regulations direct the responsible official to "use the best available scientific information to inform the planning process." 36 C.F.R. § 219.3. The Service is to determine "what information is the most accurate, reliable, and relevant to the issues being considered" and document how the "best available scientific information was used to inform . . . the plan decision . . ." Id. In this case, the Service is not using (or documenting how it is using) the best available science. The existing Forest Plan Standard #4a includes standards for hiding cover and road-density in big game habitat and was based on extensive peer review and published science, including Lyon et al. (1985), Basile and Lonner (1979), Burbridge and Neff (1976), and Coggins (1976). For this reason, the Standard was incorporated into a	Note to Reader: Information used for the Forest Plan amendment and the wildlife analyses are based on best science and direct knowledge of species use in the project area (See Big Game Amendment, Section Alternative Description/Alternative B/Discussion and the wildlife analyses in Chapter 3).

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number of Region One Forest Plans and has served as the applicable standard for the Helena National Forest for nearly 30 years. It is also why the Service is choosing to keep Standard #4a in place outside the analysis area and on the Helena National Forest, including in the Elkhorn Mountains(47-1) The Service's proposed amendment would replace Standard #4a with an untested standard based on maintaining a certain percentage of big game security areas based on two variables: (1) blocks of big game habitat of at least 250 acres or larger; and (2) distance from an open motorized route during the rifle big game hunting season (10/15 - 12/1). Maintaining sufficient hiding cover for big game within the "security areas" is no longer part of the standard. And, the new standard does not define "big game habitat." Helena Hunters does not support the new standard. The Service cannot logically define "security areas" in the absence of a hiding cover standard. As proposed, an area would be deemed "secure" based solely on the area's distance from an open road and regardless of the amount (or lack of) forest cover. (47-2) In other words, under the Service's proposed amendment, a 1,000 acre clear cut – a non-secure area for elk – would qualify as "big game security" so long as it is a half mile from a motorized route open during the hunting season. Helena Hunters is not aware of any scientific support for this approach. Both Hillis et al. (1991) and Christensen et al. (1993) require cover in elk security areas. (47-8) Hillis et al. (1991) does not expressly include a standard for hiding cover but the paper does discuss the importance of cover (as do other papers) and does recognize that security areas may consist of a variety of cover types. Notably, in a April 12, 2013, letter to Greg Munther of Montana Backcountry Hunters and Anglers regarding the Service's proposed amendment for the neighboring Blackfoot Travel Plan (the letter was provided with Mr. Munther's comments on the DEIS) Hillis and Jack Lyon describe the 250 acre block size requirement as a "hiding cover" variable. Clearly, the amount of available hiding cover in security areas – and how it will be managed – is an important factor that must be considered and explained by the Service.	(47-1) The Forest Plan amendment recognizes the body of research that was used to craft Standard 4a and discusses the rationale for changing the standard. "Alternative A - was crafted to provide big game security during the hunting season and largely reflected work by Coggins (1976), Basile and Lonner (1979), and Lyon et al. (1985) that was based on a focused road building and timber management program on National Forests in Montana. While this provision remains relevant – i.e. maintaining big game security during the hunting season - the method by which big game security is measured needs to be updated to reflect more recent scientific deliberations and to address shortfalls in the application of the current standard, primarily the fact that the current standard is not a particularly sensitive indicator of changing elk security conditions." See the Forest Plan amendment Alternative Description/Alternative B/Discussion. (47-2) Cover guidelines were incorporated into Forest Plan amendment Alternative B to address this concern. See the Forest Plan amendment Alternative Description/Alternative B. (47-8) Refer to response 47-2.

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(2) Reasonable range of alternatives. NEPA "mandates that agencies 'study, develop, and describe appropriate alternatives to recommended course of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." Pit River Tribe v. U.S. Forest Service, 469 F. 3d 768, 785 (9th Cir. 2006) (quoting 42 U.S.C. § 4332 (E)); see also 42 U.S.C. § 4332 (2) (C) (iii) (must consider "alternatives to the proposed action"). The alternatives analysis as "the heart" of the environmental analysis because it presents "impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options." 40 C.F.R. § 1502.14. The alternatives analysis guarantees that "agency decision makers '[have] before [them] and take into proper account all possible approaches to a particular project (including total abandonment of the project) which would alter the environmental impact and the cost-benefit balance.'" Bob Marshall Alliance v. Hodel, 852 F. 2d 1223, 1228 (9th Cir. 1988) (citations omitted). "Informed and meaningful consideration of alternatives . . . is thus an integral part of the statutory scheme" and critical to the goals" of NEPA. Id. at 1228-29. In this case, the Service fails to adequately describe, let alone consider and analyze a reasonable range of alternatives to the proposed amendment. No alternatives to the proposed amendment, other than the "no action" alternative, are mentioned or analyzed in the DEIS. This is a blatant violation of NEPA. The Service must (but has failed) to analyze a reasonable range of alternatives to the proposed amendment. (47-9) At the very least, this would include a more thorough analysis of the no action alternative (keep standard #4a) and then evaluating and comparing a wide range of new standards/approaches for managing big game habitat in the Helena National Forest based on the best available science. Such alternatives might include: (1)	(47-9) (Planning might need to address the reasonable range of alternatives) Note to reader: The following comments (1-6) all fall under comment (47-10) (47-10) (1) The Forest Plan amendment provides the rationale for Alternative B relative to the Hillis model; Alternative B is in

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applying the Hillis model as described in Hillis et al. (1991) without any changes; (2) increasing block sizes, threshold values, and/or distances from roads or making other modifications to the Hillis method's criteria to account for difference between the eastside and Westside forests; (3) the Service's current proposed amendment; (4) keeping parts of Standard #4a and combining it with other approaches, including the Hillis method; (5) keep the existing standard work towards compliance by increasing hiding cover and reducing road density ; or (6) develop an entirely new approach based on current habitat conditions and harvest numbers for the analysis area and after consulting local researchers and biologists. (47-10) (3) Purpose and need. Pursuant to NEPA, the Service must "specify the underlying purpose and need" of the proposed action. 40 C.F.R. § 1502.13. Doing so is important because it dictates the range of alternatives that must be considered and evaluated by the Service (see above). The purpose and need of the proposed amendment is not adequately described in the DEIS. The Service maintains the purpose and need is to bring big game security in line with the best available science but, as outlined above, this is inaccurate. The proposed amendment is not based on the best available science because it fails to include a hiding cover component. (47-11) A more honest purpose and need statement would reference the Service's prolonged failure to comply with an important Forest Plan standard (big game standard 4(a)) for security. As the Service concedes, elk numbers "have been steadily increasing" since the existing Standard #4a was adopted. So, decline in elk numbers and a need to shift management strategies to improve big game management is not the motivation. The Service mentions that Standard #4a is 28 years old and does not reflect the "relevant science" but, as outlined above, this is inaccurate. The standard was developed for the Helena and other National Forests. In the end, the Service's proposed	keeping with the Hillis model since Hillis et al. emphasize that "strict adherence to the guidelines should be avoided". See the Forest Plan amendment Alternative Description/Alternative B/Discussion section. 2) The Forest Plan amendment Alternative B was updated to reflect public comments regarding security on eastside Forests, particularly with regards to patch size and security threshold values. Security is "defined as a proportion of an elk herd unit within the administrative boundary of the Helena Ranger District that consists of an area of at least 1000 acres in size that is at least ½ mile from a motorized route open to the public between 9/1 and 12/1. Security blocks are adjusted for constrictions less than or equal to ½ mile in width". Alternative B also includes a goal to "[m]aintain or, where opportunities arise, improve big game security in those portions of an elk herd unit within the administrative boundary of the Helena Ranger District during the 9/1 – 12/1 hunting season where security is less than 50%. Maintain big game security in those portions of an elk herd unit within the administrative boundary of the Helena Ranger District between 9/1 and 12/1 where security is greater than or equal to 50%". See the Forest Plan amendment Alternative Description/Alternative B. (3) We replaced the DEIS proposed amendment in order to be responsive to public comments. (4) and (5) An alternative was considered but not carried forward to test the efficacy of closing all Forest Roads in order to achieve consistency with Standard 4a. That analysis concluded that "5 out of 6 EHUs would meet Standard 4a (compared with 4 out of 6 in Alternative 5, the most aggressive Alternative in terms of

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amendment is more about giving the Service more flexibility and latitude in forest management and travel planning than proper management of big game habitat. This needs to be conveyed to the public. (47-12) (4) Direct impacts. Pursuant to NEPA, the Service is required to assess how the proposed amendment may directly impact the environment. Direct impacts are caused by the action and occur at the same time and place. See 40 C.F.R. §1508.8. The direct impacts of an action must be analyzed based on the affected interests, the affected region, and the locality in which they will occur. 40 C.F.R. § 1508.27 (a). Here, the Service failed to take a hard look at the direct impacts of the proposed amendment which– by eliminating the hiding cover – will result in less hiding cover on National Forest lands in the EHU (and more timber harvest), increased road-densities, and potentially less real security in big game habitat. Nowhere in the DEIS, however, does the Service analyze what the direct impacts of these changes will be on survival of male big game animals and habitat (elk, deer, and moose) or on other MIS, sensitive, and listed species (lynx and grizzlies) or proposed to be listed species (wolverine) inhabiting the area. Most of these species depend on (and need) dense forests with high levels of horizontal cover, secure areas, and less roads for long-term survival and recovery. Nor does the Service analyze how the proposed amendment will impact lynx critical habitat (the PCEs) or the importance and use of the area as a linkage zone or travel corridor for wildlife. (47-13) In the DEIS, the Service concludes that loss of hiding cover (and eliminating the standard) will have no negative effect on big game security but no analysis is provided. And, the assumption that cover is not important for big game species like elk, deer, and moose is belied by the best available science, including Hillis (1991). (47-13) The loss of hiding cover from timber harvests has the potential to "severely impact	road closures during the hunting season). Although that analysis indicates that it's possible for the Forest to close enough roads in the Quartz Creek EHU to achieve compliance with Standard 4a, several of those road miles over which the Forest has discretion are located outside of the Travel Plan project area and have already been subject to a travel plan decision (i.e. Clancy Unionville Vegetation Manipulation and Travel Management Project). The few miles of open roads in Quartz Creek EHU that could be closed as part of the Divide Travel Plan decision access private land. The Greenhorn EHU would remain out of compliance with Standard 4a because the Forest simply does not have sufficient road closure discretion. Even if it were possible to close all of the roads in the project area (several miles of roads are outside of the Forest Service's jurisdiction), some of the concerns identified by MFWP in the Montana Final Elk Management Plan (MFWP 2005) would not be ameliorated especially in those HDs where access to elk is a management concern". See the Forest Plan amendment Findings Required by Laws, Regulations, and Policies/National Environmental Policy Act/Comparison of Alternatives/Alternative A/Discussion and Chapter 2 of the FEIS. (6) Alternative B was developed with local biologists and researchers. See the Forest Plan amendment, Alternative Description/Alternative B/Discussion (47-11) Cover guidelines were incorporated into Forest Plan amendment Alternative B to address this concern. Also, See the Forest Plan amendment Alternative Description/Alternative B.

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remaining security and, ultimately, hunter opportunity." Hillis (1991) at 42; see also Jellison (1998) (hunter opportunity down on the Bighorn National Forest due to "accelerated timber harvesting . . . [that] sent former elk hiding cover to the sawmills and logging roads permeating previously secluded areas."); Christensen et al. (1993) ("As you move east into Montana and over the Continental Divide, cover considerations become more important because cover is less abundant and less contiguous . . . it will be important to develop long-term perspectives (rotation length) on cover management that address condition, quantity, location, and configuration."). Notably, the proposed amendment is only described in Appendix D - it is not incorporated into the affected environment or environmental consequences section of the DEIS. This is a major oversight. The Service must take a hard look at how the proposed amendment will impact the environment, including but not limited to, soil quality and productivity, water quality (sediment from existing routes in the analysis area is currently a problem), wetlands, Inventoried Roadless Areas (IRAs), wilderness values, integrity and use of the area as a corridor or "linkage zone" for wildlife, and habitat and population numbers for threatened and endangered species (including lynx and grizzlies), sensitive species (wolverine - currently proposed for listing), and various MIS on the forest, especially forest-dependent species. The Service must also consult with the U.S. Fish and Wildlife Service pursuant to Section 7 of the ESA, 16 U.S.C. § 1536, to determine whether and how the proposed amendment may affect grizzlies, wolverine (once listed and conference with the agency now), lynx, and designated lynx critical habitat. (5) Indirect impacts. Pursuant to NEPA, the Service must take a hard look at the indirect effects of the proposed action. Indirect effects of a proposed action are effects that are caused by the action but occur later in time or are further removed in distance. 40 C.F.R. §	(47-12) The intent of amending Standard 4a is articulated in the Forest Plan amendment throughout that document. (47-13) The amendment does not mandate or suggest that cover be removed. In fact, it encourages the retention of hiding and concealment cover where it exists and creation of conditions that will lead to rapid recruitment of cover where it does not—both within and between elk security areas. What the amendment does not do is to hang compliance with the standard on a specific percentage of hiding cover. Currently, widespread loss of hiding cover has nothing to do with Forest Service actions, but rather, with the ubiquitous mountain pine beetle epidemic. This will be the primary driver of cover patterns over the next several decades and of habitat use patterns of species that depend on cover to one degree or another. The amendment will have no impact on lynx management. Lynx are managed under the Northern Rockies Lynx Management Direction (NRLMD), which requires that forest stands providing suitable winter habitat for snowshoe hares (both early seral and mature multistoried stands) is preserved in areas outside the wildland-urban interface (WUI). All projects must meet these standards. (47-14) See comment above regarding cover.

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1508(b). Indirect effects "may include growth inducing effects or other effects related to induced changes in pattern of land use; population density or growth rate; and related effects on air, water, and other natural resources." Id.	
Here, the proposed amendment will likely result less hiding cover of National Forest lands. This may push elk off of public lands and onto private lands (assuming security is provided on those lands).(47-13) And the loss of hiding cover, most likely from timber projects, will come with additional logging roads and skid trails thereby providing even more access into secure areas. In addition, eliminating Standard #4a's road density standards paves the way for more roads and motorized trails on National Forest lands which, in turn, means more public access to remote areas. These roads – which make it easier and faster for walking, biking, and horseback riding – will funnel more hunters, trappers, and recreationists into otherwise secure habitat. No analysis of these and other indirect effects are provided in the EIS. (47-14)	(47-13) Cover guidelines were incorporated into Forest Plan amendment Alternative B to address this concern. Cumulative effects associated with reasonably foreseeable projects that may need site-specific amendments are described in the amendment. See the Forest Plan amendment Alternative Description/Alternative B and the Cumulative Effects section. (47-14) Chapter 3 in the FEIS includes the discussion "Application of the Security Area Standard".
(6) Cumulative impacts. Pursuant to NEPA, the Service must analyze the cumulative impacts of the proposed amendment.(47-15) Cumulative impacts are "the impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." 40 C.F.R. § 1508.7. Cumulative impacts can result from "individually minor but collectively significant actions taking place over a period of time." Id.	(47-15)The Forest Plan amendment includes a cumulative effects discussion of past and proposed site-specific and programmatic amendments. See the Cumulative Effects section.
The proper consideration of cumulative impacts under NEPA requires "some quantified or detailed information; general statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided." Great Basin Mine Watch v. Hankins, 456 F. 3d 955, 971 (9th Cir. 2006). Moreover, the "analysis must be more than	(47-16)See above comment.

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perfunctory; it must provide a useful analysis of the cumulative impacts of past, present, and future projects." Id. The Service "must do more than just catalogue relevant past projects in the area." Id. It must give a "sufficiently detailed catalogue of past, present, and future projects and provide adequate analysis about how these projects, and the difference between the projects, are thought to have impacted the environment." Id. Some "quantified assessment of their combined environmental impact" is required. Id. at 972. (47-16)	
Here, the Service neglected to identify or properly consider and analyze how eliminating Standard #4a and replacing it with the proposed amendment may cumulatively impact all big game species (not just elk but deer and moose as well), other forest dependent species that rely on hiding cover (including MIS, sensitive, and listed species like lynx), grizzlies and grizzly bear security (47-17), water quality, soil quality and productivity, cultural and historic property, wilderness values, IRAs, and wildlife connectivity and use of the area as a linkage or travel corridor along the Continental Divide.	(47-17) See above comment (cumulative effects) and see the table "Compatibility of Forest Plan Amendment Alternative B-Preferred Alternative with Existing Wildlife Standards" in the Forest Plan amendment. Also, several cover standards remain in place and should serve to address the issue identified in this comment. See the Forest Plan amendment table "Forest-wide and Management Area Specific Standards Relevant to Big Game".
At present, there are a number of Federal, State, and private actions that have occurred, are occurring, or are reasonably certain to occur in the Helena National Forest, the EHUs, and the proposed analysis area that may be having a cumulative impact on big game security and other resources and must be analyzed by the Service in conjunction with the proposed amendment (47-18). These include, but are not limited to: forest management on public lands (thinning, salvage, regeneration harvests, hazardous tree removal, pre-commercial thins) and associated roads, skid trails, and disturbance; the R-1 and N-1 amendments for the neighboring Blackfoot Travel Plan; the new Blackfoot Travel Plan (including the 300 foot dispersed camping authorization); climate change; the Divide Travel Plan; private land development and forest management; motorized recreation and travel planning; beetle-kill, climate change, livestock grazing, highways, hunting, and superfund cleanup/storage.	(47-18) The wildlife analysis in Chapter 3 describes cumulative effects to elk (See chapter 3, Elk, Cumulative Effects).
(7) Ensuring the viability of MIS.	

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Under NFMA, the implementing regulations, and the Helena Forest Plan, the Service is required to manage wildlife habitat on the Helena National Forest to ensure viable populations of existing native species are maintained. To do so, the Service identified management indicator species (MIS) for various species groups within the Helena National Forest whose habitat is most likely to be changed by forest management activities. The MIS for the mature tree dependent group, for instance, is the marten. The old growth dependent group is represented by the pileated woodpecker and the goshawks; the snag dependent groups is represented by the hairy woodpecker; the threatened and endangered group includes the grizzly bear (and other species); and the commonly hunted MIS are elk, mule deer, and bighorn sheep. These MIS represent a proxy or surrogate for the health and viability of many other species. While the Service retains some flexibility with respect to the appropriate methodology used to monitor population numbers (actual and trend) of MIS, i.e., using population data on MIS and/or habitat data as a proxy for MIS population data (commonly referred to as the "proxy-on-proxy" approach) the mandate to maintain viable populations of MIS like elk, mule deer, marten, grizzlies and woodpeckers, cannot be ignored. And the methodology employed must be reasonably reliable and accurate. Native Ecosystems Council v. Tidwell, 599 F. 3d 926, 933 (9th Cir. 2010). If, for example, the Service decides to use habitat as a proxy for population numbers for MIS, then the proxy results must mirror reality. Maintaining the acreage of habitat necessary to maintain viable populations of big game species (elk, deer, and moose) on the Helena National Forest must in fact ensure viable populations (47-19) are maintained. At the very least, the Service must describe the quantity and quality of habitat that is necessary to sustain the viability of big game species and explain its methodology for measuring this habitat. Native Ecosystems Council v. Weldon, 848 F. Supp.2d 1207, 1213 (D. Mont. 2012).	(47-19) The Forest Plan amendment describes elk trends Forestwide and within hunting districts; it also includes a cover analysis by elk herd unit. The amendment concludes that "[w]e would also continue to achieve our objective of "ensuring that viable populations of existing…animal species are maintained" (USDA 1986, p. II/17). Elk habitat will remain abundant and well distributed across the Forest. It is anticipated that the Forest will retain security components necessary to maintain a viable and huntable elk population". (See the Forest Plan amendment, National Forest Management Act section.)

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In the Helena National Forest, the Service uses the big game standards, including Standard #4a, as a means of ensuring compliance with NFMA's viability requirement. Compliance with Standard #4a's hiding cover and road-density standard, for instance, is used as a proxy for population numbers and composition of elk and, as such, other big game species. The proposed amendment, however, eliminates standard #4a and replaces it with an untested standard based solely on size and distance from an open route during the hunting season. Hiding cover for big game and other forest dependent species was eliminated from the big game standard. (47-20) And, under the new standard, "security" is allowed to dip to 24% of an EHU in certain areas. Because it is untested and eliminates the standard for hiding cover and road-density, there are no assurances that the new standard will work. There are no assurances, let alone reasonable assurances, that the new standard is reliable and accurate and will ensure viable populations of elk and other big game species will be maintained. See Weldon, 848 F. Supp.2d at1214-1215. Indeed, under the proposed amendment, a 1,000 clear cut would qualify as "big game security" so long as it is a half mile from a motorized route open during the hunting season. Use of the new standard as a proxy for monitoring populations (actual and trend) of MIS like elk and deer, therefore, is a violation of NFMA, the implementing regulations, and the Forest Plan. (8) Non-compliance with other forest plan standards. (47-21) Pursuant to NFMA, the Service must ensure that the proposed amendment (as well as the proposed Divide Travel Plan) is consistent with the Helena Forest Plan. 16 U.S.C. § 1604 (i). If not, then the responsible official must either change the proposed amendment to bring into compliance with the other standards in the Forest Plan or amend to the other Forest Plan standards.	(47-20) Cover guidelines were incorporated into Forest Plan amendment Alternative B to address this concern. See the Forest Plan amendment Alternative Description/Alternative B. (47-21) See the table "Compatibility of Forest Plan Amendment Alternative B-Preferred Alternative with Existing Wildlife Standards" in the Forest Plan amendment. All wildlife related standards are included in that table.

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Here, the Service has failed to ensure the proposed amendment - which eliminates the existing hiding cover standard for big game security – is consistent with the following existing standards in the Helena Forest Plan: •Big game Standard #1 requiring that important summer and winter range for big game species include adequate hiding and thermal cover to support habitat potential. The Service must (but has failed) to explain how the proposed amendment – which does away with the hiding cover standard – will ensure compliance with this important standard; •Big game Standard #2 requiring that an environmental analysis for all project work include a cover analysis at the drainage or EHU level; •Big game Standard #3 directing that elk summer range be maintained at 35% or greater hiding cover and areas of winter range maintained at 25% or greater thermal cover in drainages or EHUs. This standard incorporates all land (private, state, and federal) in the EHU; •Big game Standard #4 directing the Service to implement an aggressive road management program to maintain or improve big game security. The Service must explain how the proposed amendment – which removes standards for maximum road density in the EHUs, exempts private and state lands from the big game standards, ignores the caveats in the Hillis model, and allows for the reduction in elk security to the 30% threshold – qualifies as an "aggressive" program to maintain and improve big game security; •Big game Standard #4b stating that elk calving grounds and nursery areas will be closed to motorized vehicles during peak use by elk; •Big game Standard #4c directing that all winter range areas be closed to vehicles between December 1 and May 15;	

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•Big game Standard #5 dictating the minimum size areas for hiding and thermal cover; •Big game Standard #6 stating that the Service will follow the Montana Cooperative Elk-Logging Study Recommendations (Appendix C in the Forest Plan); •Big game Standard #10 stating that moose habitat will be managed to provide adequate browse species diversity and quantity to support current moose populations. Notably, Standard #4a is a big game standard designed to protect habitat for elk, deer, and moose. Mule deer and moose numbers are in decline in western Montana and eliminating standards for habitat cover may make a bad situation worse for these big game species; •The standards, guidelines, and objectives included in the Northern Rockies Lynx Management Direction ("NRLMD"); •The grizzly bear standards included in the Helena Forest Plan, including but not limited to the requirement, in occupied grizzly habitat, to minimize man-caused mortality by limiting the open road density to the 1980 density of 0.55 miles per square mile and the IGBC's open road, total road, and core area standards for grizzly bear habitat; •All standards and monitoring requirements of MIS, including but not limited to all forest (mature, old growth, snag) dependent species and sensitive, threatened and endangered species. (9) Amending big game standard 4(a) is a significant amendment. (47-22) The Service's proposed amendment to big game standard 4(a) in the Helena National Forest Plan qualifies as a significant amendment and thus, under the National Forest Management Act (NFMA), requires an EIS and full-blown analysis	(47-22) The National Forest Management Act section in the Forest Plan amendment identifies the factors that were considered to determine amendment significance. That analysis concluded that the "amendment would not alter the long-term relationship between levels of multiple-use goods and services originally projected in the Forest Plan for wildlife habitat, Allowable Sale Quantity, or other resource outputs, nor does it have an important effect on the entire land management plan or affect land and resources throughout a large portion of the planning area during the planning period". See that section, in

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of impacts. See 16 U.S.C. § 1604(f) (4). According to the Forest Service Manual (FSM) 1926.51, the types of non-significant changes to Forest Plans include: (1)Actions that do not significantly alter the multiple-use goals and objectives for long-term land and resource management. (2)Adjustments of management area boundaries or management prescriptions resulting from further on-site analysis when the adjustments do not cause significant changes in the multiple-use goals and objectives for long-term land and resource management. (3)Minor changes in standards and guidelines. (4)Opportunities for additional projects or activities that will contribute to achievement of the management prescription. FSM 1926.52 explains that the types of changes that are "significant" and thus require a comprehensive EIS include: (1)Changes that would significantly alter the long-term relationship between levels of multiple-use goods and services originally projected. (2)Changes that may have an important effect on the entire land management plan or affect land and resources throughout a large portion of the planning area during the planning period. As explained above, the Service's proposed amendment, which fails to include any requirements for hiding cover within big game security areas across the entire Divide (and neighboring Blackfoot) analysis area is not a minor change.	particular the table "Factors for consideration to determine amendment significance".

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On the contrary, such action will significantly alter the long-term goals and objectives for managing the Divide analysis area for big game and other species that depend on hiding cover (grizzlies and lynx). Such action will "significantly alter" how this important area is managed and will likely impact and influence how the Helena National Forest manages habitat for threatened species and wilderness quality lands into the future. This is a significant change to the Helena Forest Plan. Thank you in advance for taking the time to consider the issues and concerns raised in these comments. If you have any questions or wish to discuss these issues, please do not hesitate to contact Helena Hunters (Gayle Joslin) or me at the number below. Sincerely, /s/ Matthew Bishop Matthew Bishop Western Environmental Law Center 103 Reeder's Alley Helena, MT 59601 (406) 324-8011 (tel.) (406) 443-6305 (fax) bishop@westernlaw.org On behalf of: Helena Hunters and Anglers Association Contact: Gayle Joslin 219 Vawter Street Helena, MT 59601 (406) 442- 2705	
(48) Helena District Ranger Heather DeGeest, Helena National Forest Attn: Divide Travel Plan 880 Skyway Drive Helena, MT 59602	

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Dear MS DeGeest, As a landowner-part-time-resident of Montana, I am highly concerned with keep the great state great. Therefore, I am writing to you to express my views and include my thanks for considering my views, on the Divide Travel Plan. I ask you to fully protect the Continental Divide Trail and surrounding wildlands by adopting Alternative #3 and CDT corridors as follows: Protect Nevada Mountain wildlands along the CDT by adopting Alternative #3, the only alternative based on a collaborative winter agreement endorsed by the Montana Snowmobile Association, Montana Fish Wildlife and Parks and the Montana Wilderness Association in 2005. Protect the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round area protection to all Little Blackfoot Roadless Lands. (48-1) Expand year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass. (48-1) I feel it is important to connect with the land of our ancestors, as our ancestors saw, loved, and kept it. My you be guided by wisdom in your decision on this issue. Yours truly, Russell Blalack Section 26, T1N R31E nr. Hardin, MT 59034.	(48-1) Refer to Alternative 3. (48-2) Refer to Alternative 4.
(49) From: Lynette Dumont <nette8@comcast.net> Sent: Thursday, May 29, 2014 11:53 AM To: FS-comments-northern-helena Subject: Divide Travel Plan	

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Expand year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass. (49-1)	(49-1) Refer to Alternative 4.
(50) From: Julia Ellison <juliaellison60@gmail.com> Sent: Thursday, May 29, 2014 7:03 PM To: FS-comments-northern-helena Subject: Divide Travel Plan District Ranger DeGeest Helena National Forest Dear Ranger DeGeest: I would like to extend my appreciation for the rehabilitation work that was done in Sweeney Creek as a proposed non-motorized area. I would ask that you extend this quiet area to the Continental Divide Trail by fully protecting the Trail and the surrounding wildlands. Please adopt Alternative #3 as follows: 1. Protect Nevada Mountain wildlands by adopting Alternative #3, the only alternative that is based on a collaborative winter agreement. 2. Protect the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized year round area protection to all Little Blackfoot Roadless Lands. (50-1) 3. Expand year round non-motorized area protection to the CDT corridor from MacDonald to Priest Pass; Priest to Mullan Pass. (50-2) Thank you. Sincerely, Julie Ellison 1423 Dickinson St. Missoula, MT 59802	(50-1) Refer to Alternative 3. (50-2) Refer to Alternative 4.
(51)	

Comments	Response to Comments
From: Barbara Geller <gellerbj@gmail.com> Sent: Thursday, May 29, 2014 4:26 PM To: FS-comments-northern-helena Subject: Divide Trail Plan I support option #3. Please keep the corridor surrounding the Continental Divide trail free of motorized use (51-1). Barbara Geller	(51-1) Refer to Alternative 5.
(52) From: Mary Gerlach <mtmg@3riversdbs.net> Sent: Thursday, May 29, 2014 12:30 PM To: FS-comments-northern-helena Subject: Continental Divide Trail Thank you District Ranger DeGeest for rehabilitating vehicle damage in Sweeney Creek as a proposed non-motorized area! I hope that you will extend this quiet area to the Continental Divide Trail. The area is a treasure that should be preserved for future generations (52-1). Mary Gerlach Danhof	(52-1) Thank you for your comment.
(53) From: TrtFmnLwr@aol.com Sent: Thursday, May 29, 2014 3:32 PM To: FS-comments-northern-helena Subject: Divide Travel Plan May 29 To Whom It May Concern:	

Comments	Response to Comments
Enclosed are my comments on the Helena NF's draft Travel Plan. I believe that the primary use of the national forests should be for quiet recreational pursuits such as hunting, fishing, hiking, camping, boating, etc. Extractive industries and motorized sports should be permitted only when they do not affect those quiet recreational pursuits. To that end, please: Protect Nevada Mountain with Alternative #3 and protect the CDT corridor between Bison Mtn. and the headwaters of Ontario Creek. (53-1) Allow only non-motorized use of the CDT corridor between McDonald-Priest Pass and Mullan Pass (53-2). I have spent my summer vacation in Montana 12 times since 1990 and every summer since 2008 except for 2012. I plan to come this summer. I come for the peace and quiet and the mountain scenery. I do not want to hear ORVs and see and hear extractive industries. Thank you, Robert Handelsman 2643 Central Park Evanston, IL 60201 P.S. Thanks for repairing the damage to Sweeney Creek.	 (53-1) Refer to Alternative 5. (53-2) Refer to Alternative 3.
(54) From: Sanna Porte <sanna.porte@yahoo.com> Sent: Thursday, May 29, 2014 11:31 AM To: FS-comments-northern-helena Subject: Divide Travel Plan	

Comments	Response to Comments
TO: Helena District Ranger Heather DeGeest Dear Ms. DeGeest: I have been cross country skiing and hiking in the Nevada Mountain area for 40 years. In fact, it was one of my favorite sections of the 750-mile, two-month backpacking trip I took along the Continental Divide in 1977 (Helena to Waterton Lake, Canada). I am deeply concerned about how the travel plan will affect this special area. I strongly urge you to protect Nevada Mountain wild lands by adopting Alternative #3. Please protect Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round area protection to all Little Blackfoot Roadless Lands. Please expand year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass (54-1). Thank you so much for rehabilitating vehicle damage in Sweeney Creek as a proposed non-motorized area. I sincerely hope you will extend this quiet area to the CDT. Many thanks. Sanna Porte 127 Jefferson, Helena	(54-1) Refer to comments and responses in letter 48.
(55) From: David Rockwell <rockwell@blackfoot.net> Sent: Thursday, May 29, 2014 10:53 AM To: FS-comments-northern-helena Subject: Final "Divide" Travel Plan for the Helena Ranger District	(55-1) Refer to comments and responses in letter 48.

Comments	Response to Comments
I am writing to request that you protect Nevada Mountain wildlands along the Continental Divide Trail (CDT) by adopting Alternative #3, which in 2005 was endorsed by the Montana Snowmobile Association, Montana Fish Wildlife and Parks and the Montana Wilderness Association. I would also request you protect the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round area protection to all Little Blackfoot Roadless Lands and expand year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass(55-1). Thank you. David Rockwell PO Box 94 Dixon, MT 59831 406-246-4646 rockwell@blackfoot.net	
(56) From: Clarence Sanders <sandora99@msn.com> Sent: Thursday, May 29, 2014 3:15 PM To: FS-comments-northern-helena Subject: Divide Travel Plan Ms. Heather DeGeest Helena District Ranger Helena National Forest Attn: Divide Travel Plan 880 Skyway Drive Helena, MT 59602 Dear Ms. DeGeest, I am writing to comment on the proposed Divide Travel Plan.	

Comments	Response to Comments
In so doing I strongly support the adoption of Alternative #3 and CDT corridors as follows: 1. Protect Nevada Mountain wildlands along the CDT by adopting Alternative #3, the only alternative based on a collaborative winter agreement endorsed by the Montana Snowmobile Association, Montana Fish Wildlife and Parks and the Montana Wilderness Association in 2005. 2. Protect the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round area protection to all Little Blackfoot Roadless Lands. 3. Expand year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass. Only Alternative #3 can provide essential protection for the Continental Divide Trail and surrounding wildlands. I therefore urge the Helena National Forest to adopt Alternative #3(56-1). I wish to thank District Ranger DeGeest for rehabilitating vehicle damage in Sweeney Creek as a proposed non-motorized area. That effort serves as a model for extending quiet area protection to the CDT through adoption of Alternative #3. Thank you for the careful consideration of my comments. Clarence Sanders 4416 Morning Sun Drive Bozeman MT 59715	(56-1) Refer to comments and responses in letter 48.
(57) From: WWTFH98@aol.com Sent: Thursday, May 29, 2014 1:07 PM To: FS-comments-northern-helena Cc: wwtfh98@aol.com	

Comments	Response to Comments
Subject: Divide Travel Plan Dear Ranger Degeest, I am writing concerning The Draft Divide Plan. I often pack trip into Montana's wild lands and have a strong interest in the protection of wild areas from excessive or inappropriate usage. 1. I recommend adoption of Alternative #3 based on the endorsements of such diverse groups as MT snowmobile Assoc. and MT Wilderness Assoc. 2. Protection of the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round area protection to all Little Blackfoot Roadless Lands should be adopted. 3. Non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass should be expanded to year-round (57-1). Thanks for considering my recommendations, and for rehabilitating vehicle damage in Sweeney Creek as a proposed non-motorized area. It would be a good move to extend this quiet area to the CDT! Regards, Walter W. Tingle	(57-1) Refer to comments and responses in letter 48.
(58) From: Tim Meloy <timmeloy@gmail.com> Sent: Friday, May 30, 2014 10:09 AM To: FS-comments-northern-helena Subject: Divide Travel Plan Dear Ranger DeGeest, Please add the names of the entire Satre Meloy family, all five of us, in full support	(58-1) Thank you for your input

Comments	Response to Comments
of Alternative three of your travel plan review for the continental divide trail and the surrounding wild lands, as best enunciated by the comments of the Montana Wilderness Association of which we are strong supporters. Thank you for all the time and effort you have put into this review!	
(59) From: Gregg and Wendy Wheeler <westernwheelers@msn.com> Sent: Friday, May 30, 2014 7:56 PM To: FS-comments-northern-helena Subject: Comments on Divide Travel Plan Ranger DeGeest: The entire route of the Continental Divide National Scenic Trail through the Helena National Forest should be protected for quiet, non-motorized recreation. The trail needs better definition and signing in many areas.(59-1) As local Helenans, we hike sections of the CDNST regularly. In fact, today, we headed for Priest Pass for a hike but were turned back by culvert installation by the Forest Service, a necessary activity to be sure. Instead, we hiked south from MacDonald Pass on the CDNST through snow drifts, downed trees and wonderful fields of glacier lilies and spring beauties. During the past couple of years we've met and chatted with some of the CDNST thru-hikers in the area. They have commented that route finding near Helena is often "confusing".(59-2) We'd also encourage adoption of Alternate #3 to protect the Nevada Mountain area. This alternative reflects the work done cooperatively with snowmobilers on winter use. Thank you for all you do to make the Helena National Forest such a great place.	(59-1) Resource management is a blend of Social economic/political needs balanced with biological/ environmental needs. The preferred alternative we feel reaches this sensitive balance and provides for the public needs as it is providing for environmental concerns governed by law. (59-2) Outside the scope of the Divide Travel Plan. Thank you for your input.

Comments	Response to Comments
Sincerely, Wendy and Gregg Wheeler 1716 Highland St. Helena, MT 59601	
(60) From: Lydia Garvey <wolfhowlmama@yahoo.com> Sent: Saturday, May 31, 2014 10:53 PM To: FS-comments-northern-helena Subject: Alternative #3! I strongly urge you to: 1. Protect Nevada Mountain wildlands along the CDT by adopting Alternative #3, the only alternative based on a collaborative winter agreement endorsed by the Montana Snowmobile Association, Montana Fish Wildlife and Parks and the Montana Wilderness Association in 2005. 2. Protect the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round area protection to all Little Blackfoot Roadless Lands. 3. Expand year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass (60-1). Do your job- Protect Our Public lands, waters, wildlife, health & future! We/you have to think- 7 generations ahead. Keep it Wild & pristine! Your attention to this most urgent matter would be much appreciated by all present & future generations of all species. Thank you Lydia Garvey Public Health Nurse 429 S 24th st Clinton OK 73601	(60-1) Refer to comments and responses in letter 48.
(61)	

Comments	Response to Comments
May 18, 2014 Transcribe from hand written letter Received June 1, 2014 Dear Sir or Madam, Currently, I write this letter from the Manzano Mountain Wilderness in central New Mexico. The Manzano mountains and its forest rise out of the high desert. As you climb into the high country the ponderosas give way to the aspens and firs. This area is beautiful, however it is missing something. It lacks the authenticity and wildness of the historic west. The absence of top tier predators has had a taming effect on the land, which has damaged the ecosystem as a whole. The Northern Rockies of Montana still hold the characteristics and natural heritage of pre-colonial America. No other state in the lower forty eight has the wealth. This wealth exceeds the profits of timber harvesting, resource exploration, and land development. Americans are finally beginning to realize that we do not need to have a road built through every slice of public land, a ski lift going up every mountain, or allow OHVs to steal the tranquility and pristine aspects of the forest. I write this letter in support of designating Nevada Mountain and Electric Peak as wilderness. Once our wild lands are gone they are gone forever…(61-1) Thank you for listening, Zachary Cardosi 815-549-3139 zmcardosi@gmail.com	(61-1) This is outside the scope of the Divide Travel Plan.
(62) May 22, 2014 Transcribed from hand written letter Received June 1, 2014 Dear Sir or Madam: There are a good deal of places in the United States where you can ride a dirt bike,	

Comments	Response to Comments
cut timber, develop land, explore resources, and simply dominate the land as a human. What we lack are places where we can be humbled. Montana, as opposed to any other state in the lower forty-eight, is fortunate to still have some of these humbling lands. I write this letter in support of designating Nevada Mountain and Electric Peak as Wilderness. Both of these areas carry a great deal of power within them. They have the power to humble humans and support grizzly populations. Without the protection of wilderness these landscapes are at risk of being sacrificed and lost forever. I ask you for your support in the protection of these areas and the non-motorized prescription in Alternative 3(62-1). Thank you, Zachary Cardosi (815)549-3139 zmcardosi@gmail.com	(62-1) Thank you for your comment.
(63) From: Gerry Jennings <gerger1@bresnan.net> Sent: Sunday, June 01, 2014 10:15 PM To: FS-comments-northern-helena Subject: Divide travel plan To: Helena District Ranger Heather DeGeest: This is a letter urging you to fully protect the Continental Divide Trail and surrounding wildlands by adopting Alternative #3 and CDT corridors as follows: 1. Adopt Alternative #3, which protects Nevada Mountain wildlands along the CDT. It is the only alternative based on a collaborative winter agreement endorsed by the Montana Snowmobile Association, Montana Fish Wildlife and Parks and the Montana Wilderness Association in 2005. 2. Extend non-motorized, year-round area protection to all Little Blackfoot Roadless Lands which will protect the CDT corridor between Bison Mountain and the	(63-1) Refer to comments and responses in letter 48.

Comments	Response to Comments
headwaters of Ontario Creek. 3. Also expand year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass (63-1). I want to thank you for rehabilitating vehicle damage in Sweeney Creek, a proposed non-motorized area. Please extend this quiet area to the CDT. Thank you for considering the above requests. Sincerely, Gerry Jennings 317 Fox Drive Great Falls, MT 59404	
(64) Comment Sheet Received June 2, 2014 Comments are on DEIS Commenter would like to be notified by email and printed in the mail Charla A. Bacon Bigsky22@blackfoot.net PO Box 210 209 Blanchard St. Elliston, MT 59728 I encourage you to leave alternative (1) of the DEIS Travel Plan in place. Current forest wide travel rules & regulations are adequate and require no further restriction on year round motorized or snowmobile use (64-1). I was born & raised in the Elliston area. My husband and I enjoy riding the forest service roads and trail via jeep, 4 wheelers and snowmobiles. We are both in our 70's and have somewhat limited physical capabilities. If this forest service plan continues to close access to public lands this will be viewed as a discriminatory act toward the elderly and	(64-1) Resource management is a blend of Social economic/political needs balanced with biological/ environmental needs. The preferred alternative we feel reaches this sensitive balance and provides for the public needs as it is providing for environmental concerns governed by law.

Comments	Response to Comments
handicapped individuals. I won't be able to continue to share my love of nature with my grandchildren.	
(65) Comment Sheet Received June 2, 2014 Comments are on DEIS Commenter would like to be notified by email Donald E. Bacon Bigsky22@blackfoot.net PO Box 210 209 Blanchard St. Elliston, MT 59728 I am adamantly opposed to alternative 2, 3, 4 DEIS Travel plans. No action is required and alternative #1 should remain in place. Concerning alternative map legends on each proposal are inconsistent and very misleading. Several trails dead end, leaving no emergency or escape routes. By closing additional roads & trails you are DISCRIMINATING against the handicapped and elderly (65-1). I am 73 yrs old and ride in the mountains surrounding Elliston every week – both winter and summer. I no longer have the physical ability to walk, hike or hunt in the area you wish to restrict year around motorized vehicle travel (65-2). June 1, 2014	(65-1) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. (65-2) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. In all Alternatives motorized opportunities are provided and within those motorized routes there are different skill levels provided for elderly and disabled use.
(66) From: Matt Bishop To: FS-comments-northern-helena-helena Cc: bishop@westernlaw.org Subject: Divide Travel comments Date: Monday, June 02, 2014 5:08:04 PM Attachments: Comments.DEIS.Divide.Travel.Plan.May.30.2014.doc.pdf Please see the attached comments on the DEIS for the Divide Travel Plan in .pdf.	(66-1) Information used for the Forest Plan amendment and the wildlife analyses are based on best science and direct knowledge of species use in the project area (See Big Game Amendment, Section Alternative Description/Alternative B/Discussion and the wildlife analyses in Chapter 3). (66-2) We have applied the best available science in the wildlife analysis [see the Wildlife Background Report "References Cited"

Comments	Response to Comments
Thank you, Matt Matthew Bishop Western Environmental Law Center 103 Reeder's Alley Helena, Montana 59601 (406) 324-8011 (tel.) (406) 443-6305 (fax) bishop@westernlaw.org www.westernlaw.org June 2, 2014 Sent via e-mail Helena National Forest Attn: Divide Travel Plan 2880 Skyway Drive Helena, MT 59602 comments-northern-helena-helena@fs.fed.us Re: Helena Hunters and Anglers Association's comments (supplemental) on the draft EIS for the Divide Travel Plan. The Western Environmental Law Center (WELC) hereby provides these supplemental comments on the Forest Service's (the Service's) draft environmental impact statement (DEIS) for the Divide Travel Plan in the Helena Ranger District of the Helena National Forest (hereinafter "Divide travel plan" or "travel plan"). The Divide Travel Plan designates routes (roads and trails) for motorized use, authorizes car camping off-road, and opens areas for over-snow motorized vehicles in the analysis area (hereinafter "proposed action" or "proposed travel plan"). These comments are submitted by WELC on behalf of the Helena Hunters and Anglers Association (hereinafter "Helena Hunters"). These comments supplement and do not replace the comments already submitted by Helena Hunters (Gayle Joslin).	(p. 290-310)]. We have used this information to determine which routes need to be closed because of impacts to key habitats—rather than simply closing roads to lower overall open route density. Camping has been limited to road corridors, which do not affect elk security areas or effective habitat sites for grizzly bears—both of which are situated further from open roads. (66-3) The Forest Plan amendment recognizes the body of research that was used to craft Standard 4a and discusses the rationale for changing the standard. "Alternative A - was crafted to provide big game security during the hunting season and largely reflected work by Coggins (1976), Basile and Lonner (1979), and Lyon et al. (1985) that was based on a focused road building and timber management program on National Forests in Montana. While this provision remains relevant – i.e. maintaining big game security during the hunting season - the method by which big game security is measured needs to be updated to reflect more recent scientific deliberations and to address shortfalls in the application of the current standard, primarily the fact that the current standard is not a particularly sensitive indicator of changing elk security conditions." See the Forest Plan amendment Alternative Description/Alternative B/Discussion.

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Helena Hunters' members live, work, and recreate on the Helena National Forest and several of the organization's members are intimately familiar with the Divide Travel Planning Area in particular. Helena Hunters' membership is made up of professionally trained natural resource managers. They are now or have previously worked in the fields of fish, wildlife, forestry, recreation management, water quality, and environmental assessment. Helena Hunters' mission statement is commensurate with stated management objectives for the Helena National Forest: "The Helena Hunters and Anglers Association is dedicated to protecting and restoring fish and wildlife to all suitable habitats, and to conserving all natural resources as a public trust, vital to our general welfare. HHAA promotes the highest standards of ethical conduct and sportsmanship, and promotes outdoor hunting and fishing opportunity for all citizens to share equally." The following discussion itemizes Helena Hunters' comments on the DEIS for the Divide travel plan. (1) Best available science. NEPA and the Service's planning regulations direct the responsible official to "use the best available scientific information to inform the planning process." 36 C.F.R. § 219.3. The Service is to determine "what information is the most accurate, reliable, and relevant to the issues being considered" and document how the "best available scientific information was used to inform . . . the plan decision . . ." Id. (66-1) In this case, the Service must consult the latest and best science on how the proposed action, including the designation of motorized routes (roads and trails), authorization of car camping off-road, and opening areas for over snow motorized vehicles adversely impacts big game security, listed species (grizzlies and lynx) and critical habitat, habitat connectivity, and wolverines (especially habitat for denning and denning behavior) in the Divide analysis area. (66-2)	

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The Service must also incorporate the best science when making changes to big game standard 4(a) in the Helena Forest Plan ("proposed amendment"). In this case, the Service is not using (or documenting how it is using) the best available science on big game security. The existing Forest Plan Standard #4a includes standards for hiding cover and road-density in big game habitat and was based on extensive peer review and published science, including Lyon et al. (1985), Basile and Lonner (1979), Burbridge and Neff (1976), and Coggins (1976). For this reason, the Standard was incorporated into a number of Region One Forest Plans and has served as the applicable standard for the Helena National Forest for nearly 30 years. It is also why the Service is choosing to keep Standard #4a in place outside the analysis area and on the Helena National Forest, including in the Elkhorn Mountains. (66-3) The Service's proposed amendment would replace Standard #4a with an untested standard based on maintaining a certain percentage of big game security areas based on two variables: (1) blocks of big game habitat of at least 250 acres or larger; and (2) distance from an open motorized route during the rifle big game hunting season (10/15 - 12/1). Maintaining sufficient hiding cover for big game within the "security areas" is no longer part of the standard. And, the new standard does not define "big game habitat." Helena Hunters does not support the new standard. The Service cannot logically define "security areas" in the absence of a hiding cover standard. As proposed, an area would be deemed "secure" based solely on the area's distance from an open road and regardless of the amount (or lack of) forest cover. (66-4) In other words, under the Service's proposed amendment, a 1,000 acre clear cut – a non-secure area for elk – would qualify as "big game security" so long as it is a half mile from a motorized route open during the hunting season. Helena Hunters is not aware of any scientific support for this approach. Both Hillis et al. (1991) and Christensen et al. (1993) require cover in elk security areas. (66-5) Hillis et al. (1991) does not expressly include a standard for hiding	(66-4) Cover guidelines were incorporated into Forest Plan amendment Alternative B to address this concern. See the Forest Plan amendment Alternative Description/Alternative B. (66-5) Refer to response 66-4. (66-6) Such an option is presented in Alternative 5. See Wildlife Background Report, Tables 18, 19. (66-7) Direct effects on these species groups are analyzed in the Wildlife Background Report: Elk (p. 157-183), threatened/endangered species (p. 184-203); sensitive species (p. 204-226); MIS (p. 227-241). This information is also presented in equivalent sections of the FEIS. (66-8a) Effects to water quality are analyzed in the Hydrology Specialist Report in the Environmental Consequences section. As discussed in the Hydrology Specialist Report, the Divide Travel Plan decision is not anticipated to directly result in measurable additions to or reductions in road sediment delivery because it does not authorize any new ground disturbing activities. The Hydrology Specialist Report also discusses the uncertainty in predicting future sediment generation from roads as a result of changes to the open/closed status. Additional information on road impacts to streams is available in the Fisheries Specialist Report. (66-8b) Effects to Inventoried Roadless and wilderness attributes are analyzed in the Inventoried Roadless report located in the project record. (66-8c) The wildlife analysis has taken the "hard look" at these issues in the Wildlife Background Report: corridor/linkage zone

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cover but the paper does discuss the importance of cover (as do other papers) and does recognize that security areas may consist of a variety of cover types. Notably, in a April 12, 2013, letter to Greg Munther of Montana Backcountry Hunters and Anglers regarding the Service's proposed amendment for the neighboring Blackfoot Travel Plan (the letter was provided with Mr. Munther's comments on the DEIS) Hillis and Jack Lyon describe the 250 acre block size requirement as a "hiding cover" variable. Clearly, the amount of available hiding cover in security areas – and how it will be managed – is an important factor that must be considered and explained by the Service. (2) Reasonable range of alternatives. NEPA "mandates that agencies 'study, develop, and describe appropriate alternatives to recommended course of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." Pit River Tribe v. U.S. Forest Service, 469 F. 3d 768, 785 (9th Cir. 2006) (quoting 42 U.S.C. § 4332 (E)); see also 42 U.S.C. § 4332 (2) (C) (iii) (must consider "alternatives to the proposed action"). The alternatives analysis is "the heart" of the environmental analysis because it presents "impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options." 40 C.F.R. § 1502.14. The alternatives analysis guarantees that "agency decision makers '[have] before [them] and take [ ] into proper account all possible approaches to a particular project (including total abandonment of the project) which would alter the environmental impact and the cost-benefit balance.'" Bob Marshall Alliance v. Hodel, 852 F. 2d 1223, 1228 (9th Cir. 1988) (citations omitted). "Informed and meaningful consideration of alternatives . . . is thus an integral part of the statutory scheme" and "critical to the goals" of NEPA. Id. at 1228-29. In the DEIS, the Service only considers four, closely related alternatives for the	function (p. 30-40, 138-146); threatened/endangered species (p. 81-98, 184-203); sensitive species (p. 99-118, 204-226); MIS (p. 119-128, 227-239). (66-9) Indirect effects on key wildlife groups are analyzed in the Wildlife Background Report: Elk (p. 157-183), threatened/endangered species (p. 184-203); sensitive species (p. 204-226); MIS (p. 227-241). This information is also presented in equivalent sections of the FEIS. (66-10) All proposed action alternatives would, to one degree or another, reduce the overall reach of roads and motor trails into "secure" habitat. Alternatives 3 and 5 would be the most effective this way. The effects of snowmobile use on lynx are analyzed in the Wildlife Background Report (p. 193-197) for all alternatives, as is the potential for motorized intrusion into key wolverine habitat (p. 102-104, 204-209). See also equivalent wildlife sections in the FEIS. (66-11) All projects, activities, and human-related circumstances—past, ongoing, and foreseeable—are cataloged, described, and their implications for wildlife discussed in the comprehensive Cumulative Effects List (Table) in the Project Record. In addition, relevant cumulative effects are discussed for each species, species group, or habitat component in the Wildlife Background Report. Appendix B in the Report duplicates the comprehensive cumulative effects listing and indicates the nature of each activity/circumstance on each key wildlife species and habitat component.

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proposed action: (1) a "no action" alternatives which represents the existing baseline and authorizes motorized use on 286 miles of roads without seasonal restrictions (the existing baseline should only include routes designated for motorized use, not user-created two-tracks never authorized for motorized use); (2) the proposed action which authorizes motorized use on 284 miles roads without seasonal restrictions; (3) alternative three which authorizes motorized use on 262 miles roads without seasonal restrictions; and (4) alternative four which authorizes 265 miles of roads without seasonal restrictions. In the entire 155,500 acre planning area, therefore, the Service does not consider and analyze a single alternative that authorizes motorized use on less than 262 miles of roads. Most of the acreage open for over-snow motorized vehicle use in the alternatives is also very similar. Given the critical importance of the Divide area to wildlife (big game, grizzlies, wolverine, lynx) and wildlife connectivity in the region, and the adverse impacts associated with roads and high road density and over-snow motorized use (especially for denning wolverines), analyzing an alternative that authorizes motorized use on less than 262 miles of roads and less acreage for over-snow motorize use is necessary and required by NEPA. (66-6) (3) Direct impacts. Pursuant to NEPA, the Service is required to assess how the proposed amendment may directly impact the environment. Direct impacts are caused by the action and occur at the same time and place. See 40 C.F.R. §1508.8. The direct impacts of an action must be analyzed based on the affected interests, the affected region, and the locality in which they will occur. 40 C.F.R. § 1508.27 (a). Here, the Service must carefully consider and analyze the direct impacts of authorizing motorized use on hundreds of miles of routes, car camping off-route, and over-snow motorized vehicle use on thousands of acres of National Forest land in the analysis area. This includes, but is not limited to impacts on big game security and numbers, MIS, sensitive, and listed species (lynx and grizzlies) or proposed to be listed species (wolverine) inhabiting the area, (66-7) soil quality and productivity,	(66-12) These effects are analyzed in detail throughout the main body of the Wildlife Background Report, in Appendix B, and in the comprehensive Cumulative Effects Table. (66-13) These effects are discussed individually in the main segment of the Wildlife Background Report and summarized in Appendix B, as well as in the comprehensive Cumulative Effects Table (Project Record). (66-14) Thank you for your input on the issue "300 foot dispersed vehicle camping allowance". Based on public comments on the DEIS, the Helena National Forest developed alternative 5 which is the preferred alternative. This alternative does not propose a 300 foot allowance to access disperse campsites from designated routes. Instead, alternative 5 proposes the following: Parking and motor vehicle use associated with dispersed camping would be limited to no more than 70 feet from the edge of a designated route as long as: No new permanent routes are created by this activity. No damage to existing vegetation, soil, or water resources i.e., damage to live trees and shrubs, rutting, and eroding of stream banks or bare soil. Travel off-route does not cross streams. Travel off-route does not traverse riparian or wet areas. Vehicles travel to and parking associated with dispersed campsites would be limited to no closer than 30 feet of a stream or body of live water.

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habitat connectivity, Inventoried Roadless Areas (IRAs), and areas recommended for wilderness. In the DEIS, such an analysis is lacking. In sum, the Service must take a hard look at how the proposed travel plan (winter and summer) will impact the environment, including but not limited to, soil quality and productivity, water quality (sediment from existing routes in the analysis area is currently a problem), wetlands, (66-8a) Inventoried Roadless Areas (IRAs), wilderness values, (66-8b)integrity and use of the area as a corridor or "linkage zone" for wildlife, and habitat and population numbers for threatened and endangered species (including lynx and grizzlies), sensitive species (fisher and wolverine), and various MIS on the forest, especially forest-dependent species. (66-8c) The Service must also consult with the U.S. Fish and Wildlife Service pursuant to Section 7 of the ESA, 16 U.S.C. § 1536, to determine whether and how the proposed travel plan may affect grizzlies, wolverine (once listed and conference with the agency now), lynx, and designated lynx critical habitat. (4) Indirect impacts. Pursuant to NEPA, the Service must take a hard look at the indirect effects of the proposed action. (66-9) Indirect effects of a proposed action are effects that are caused by the action but occur later in time or are further removed in distance. 40 C.F.R. § 1508(b). Indirect effects "may include growth inducing effects or other effects related to induced changes in pattern of land use; population density or growth rate; and related effects on air, water, and other natural resources." Id. Here, the proposed action will designate hundreds of miles of routes for motorized use, off-route driving for car camping, and thousands of acres for over-snow motorized vehicle use. Designating roads and motorized trails on National Forest lands, areas open to car camping, and over-snow motorized vehicle use and putting this information on a MVUM means more public access to remote areas in the Divide areas. These roads	Dispersed campsites located more than 70 feet from the edge of a designated route that are identified on the alternative 5 map would remain open for dispersed camping and parking associated with dispersed camping. The five items identified under the access to dispersed campsites up to 70' from a designated route section are applicable for this as well. Alternative 5 has been analyzed by multiple resource areas. The analyses are reflected in the FEIS. (66-15) The purpose Divide Travel Plan is to provide a manageable system of designated public motorized access routes and areas within the Divide area, consistent with and to achieve the purposes of Forest Plan and travel management regulations at 36 CFR part 212 subpart B. Travel planning is required under 36 CFR part 212 regardless of the amount of available resources to enforce and monitor travel management decisions. This being said, the Helena National Forest acknowledges that any change to existing conditions (no action alternative) would potentially require additional effort from law enforcement personnel and Forest Protection Officers on a short-term basis while the users adjust to the new closures and become familiar with the use of the MVUM. However, supplying the appropriate amount of resources to monitor and conduct law enforcement is not within the scope of the Divide Travel plan. (66-16) The Forest Plan amendment describes elk trends Forestwide and within hunting districts; it also includes a cover

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– which make it easier and faster for driving, walking, biking, and horseback riding – will funnel hunters, trappers, and recreationists into otherwise secure habitat. They will also push wildlife off public lands and onto private lands in the area. The Service must analyze these indirect effects. The Service should also analyze the indirect effects of winter motorized recreation on lynx and wolverine, in particular how snow compaction from winter motorized use indirectly affects wildlife movement and, in particular lynx and the species' competitive advantage in deep snow conditions over other species, such as bobcat, coyotes, and wolves. (66-10) (5) Cumulative impacts. Pursuant to NEPA, the Service must analyze the cumulative impacts of the proposed action. Cumulative impacts are "the impacts on the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." 40 C.F.R. § 1508.7. Cumulative impacts can result from "individually minor but collectively significant actions taking place over a period of time." Id. The proper consideration of cumulative impacts under NEPA requires "some quantified or detailed information; general statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided." Great Basin Mine Watch v. Hankins, 456 F. 3d 955, 971 (9th Cir. 2006). Moreover, the "analysis must be more than perfunctory; it must provide a useful analysis of the cumulative impacts of past, present, and future projects." Id. The Service "must do more than just catalogue relevant past projects in the area." Id. It must give a "sufficiently detailed catalogue of past, present, and future projects and provide adequate analysis about how these projects, and the difference between the projects, are thought to have impacted the environment." Id. Some "quantified assessment of their combined environmental impact" is required. Id. at 972. (66-11)	analysis by elk herd unit. The amendment concludes that "[w]e would also continue to achieve our objective of "ensuring that viable populations of existing…animal species are maintained" (USDA 1986, p. II/17). Elk habitat will remain abundant and well distributed across the Forest. It is anticipated that the Forest will retain security components necessary to maintain a viable and huntable elk population". (See the Forest Plan amendment, National Forest Management Act section.) (66-17) See the table "Compatibility of Forest Plan Amendment Alternative B-Preferred Alternative with Existing Wildlife Standards" in the Forest Plan amendment. All wildlife related standards are included in that table.

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Here, the Service neglected to identify or properly consider and analyze how authorizing motorized use on hundreds of miles of routes, car camping off-road, and over-snow motorized vehicle use in the analysis area may cumulatively impact all big game species (not just elk but deer and moose as well), other forest dependent species (including MIS, sensitive (fisher and wolverine), and listed species like lynx), grizzlies and grizzly bear security, water quality, soil quality and productivity, cultural and historic property, wilderness values, IRAs, and wildlife connectivity and use of the area as a linkage or travel corridor along the Continental Divide. (66-12) At present, there are a number of Federal, State, and private actions that have occurred, are occurring, or are reasonably certain to occur in the Helena National Forest, the EHUs, and the proposed analysis area that may be having a cumulative impact on big game security and other resources and must be analyzed by the Service in conjunction with the proposed action. (66-13) These include, but are not limited to: forest management on public lands (thinning, salvage, regeneration harvests, hazardous tree removal, pre-commercial thins) and associated roads, skid trails, and disturbance; the R-1 and N-1 amendments for the neighboring Blackfoot Travel Plan; the new Blackfoot Travel Plan (including the 300 foot dispersed camping authorization); the big game amendment for the Divide planning area; private land development and forest management; motorized recreation and travel planning; beetle-kill, climate change, livestock grazing, highways, hunting, and superfund cleanup/storage. It is not enough to merely list various activities. The Service must engage in a quantified assessment of the various activities impacts of specific resources. (6) The 300 foot dispersed vehicle camping allowance. (66-14) The proposed action in the DEIS authorizes wheeled motorized vehicle travel for dispersed camping or parking associated with dispersed camping within 300 feet of all designated system routes, including roads and trails (unless signed otherwise or specifically closed) as long as: (1) no new permanent routes are created by this	

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activity; (2) no damage to existing vegetation, soil, or water resources occurs; (3) travel off-route does not cross streams, and (4) travel off-route does not traverse riparian or wet areas. According to the Service, authorizing car camping within 300 feet of all designated system routes provides a reasonable level of access for recreational purposes. The DEIS further states that, with the implementation of the criteria for resource protection described in the actions common to all alternatives section of the DEIS, any off-route vehicle impacts resulting from such use would be minimized. The DEIS also concludes that the 300 foot provision would be consistent with the 2001 Tri-State OHV Decision, the 2005 Travel Planning Rule (Travel Rule), Executive Order 11644, and the Helena Forest Plan. The DEIS further states that the Helena National Forest would make a commitment to monitoring and enforcement of this provision, in order to ensure routes would not expand in these areas and any problems encountered would be dealt with as they arise. Helena Hunters has a number of concerns about the Service's decision to authorize car camping within 300 foot (the length of a football field) off of all designated routes in the analysis area. First, allowing vehicle travel for dispersed camping for up to 300 feet from a designated travel route (roads and trails) will potentially affect a large amount of land and essentially constitutes un-managed motorized recreation in the analysis area. The authorized distance – 300 feet on either side of a designated route – equals a 600 foot corridor (two football fields in length) for driving off-route (perhaps larger – more like 610 feet – if the corridor is measured from the edge of the system route instead of the center line). Multiplying this width times the number of motorized roads and trails in the proposed action means tens of thousands of acres of National Forest land could be negatively impacted by off-route motorized travel. This is a significant decision for which resource impacts have not been specifically evaluated in the DEIS (see below).	

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Second, the premise of the 300 foot proposal seems to be that it will not be abused by the public and that no travel route to a camping site will ever be reused. This seems highly unlikely. Unmanaged off-route vehicle use has caused and will continue to cause uncontrolled proliferation of trails resulting from repeated use. Effects of off-route travel by vehicles on soil, water quality, vegetation, heritage and cultural sites, wildlife and the spread of invasive species are well documented in the scientific literature. Soil compaction and erosion contributes to sedimentation of streams, and damaged vegetation may create opportunities for establishment of invasive plant species. Many wildlife species are affected by noise and disturbance associated with vehicles. While the decision states that such use will not be allowed to create permanent routes or to impact vegetation, soil, water resources, and riparian areas, it is reasonable to assume that such impacts will occur. Indeed, the DEIS acknowledges that the Helena National Forest has never conducted a comprehensive survey of this use, but states that cursory monitoring and field checks by various Service resource crews have not resulted in any wide-spread violations or wide-spread resource concerns. Where site-specific issues have arisen, they state they have been able to address them via site-specific area closures or restrictions. Such general statements and anecdotal observations, however, do not constitute a reasonable assurance that the 300 foot provision will not result in significant and irreparable resource damage. Third, the Service states that the highest priority for monitoring will be ensuring that wheeled, motorized vehicle travel within 300 feet of designated system routes is not creating any new permanent routes and damaging vegetation, soil, or water resources, or crossing streams, riparian or wet areas. However, it does not state how site-specific problems (which seem likely to occur at some frequency) will be addressed once they are discovered. This could be a huge task for which resources are extremely limited.	

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Enforcement of travel plans is difficult and Helena Hunters does not believe the Service has the resources to monitor for illegal travel activities (66-15) (Amber Kamps, April 1, 2014 in comments to Helena Hunters). Surveys of travel restrictions in the neighboring Blackfoot Planning Area by Helena Hunters members in 2013-2014 have shown a high degree of violations and a readily apparent lack of monitoring and enforcement. This causes Helena Hunters to doubt the accuracy of the statements pertaining to intended comprehensive monitoring and enforcement of the 300 foot provision. Finally, contrary to the Service's statement in the DEIS, a blanket authorization of dispersed vehicle camping within 300 feet of all system routes is not consistent with the language and spirit of Executive Order 11644, as amended, or the 2005 Travel Planning Rule (and the 2001 Tri-State Decision was merely a one-size-fits all planning level decision that has no bearing on the designation of specific routes or areas for motorized use in the Helena National Forest). The term "dispersed vehicle camping" refers generally to the ability to drive your motorized vehicle, i.e., OHV, motorcycle, or 4 x4 car, off designated roads and trails and car camp wherever you would like. When authorizing car camping off-road on National Forest lands, the Service explains it has four options: (1) Do not provide for any driving and car camping off-road and restrict all motorized use to designated roads and trails; (2) Individually map each short spur route to a designated, existing car camping site and then include the spur route in the travel system; (3) Issue individual permits authorizing the holder to car camp off-road; or (4) Use the authority in the Travel Rule (36 C.F.R. § 212.51 (b)) to authorize limited amounts of car camping off-road within a specific distance of designated routes.	

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According to the Service, option (4) is the least preferential option that, if used, should only be applied at the individual route level and not broadly across an entire forest. The language in the Travel Rule authorizing car camping off-road "is written narrowly ('limited use,' 'within a specified distance,' 'of certain designated routes, 'solely for the purpose of')." Id. The Service, therefore, is to apply the off-road car camping provision "sparingly, on a local or State-wide basis, to avoid undermining the purposes of the [Travel Rule] . . . and to promote consistency in implementation." 70 Fed. Reg. 68264, 68285 (emphasis added); see also FSM § 7703.14(2). "Broad use of this provision could lead to corridors of cross-country motor vehicle use along many designated roads and trails, with attendant proliferation of unauthorized routes and environmental damage." For this reason, authorizing car camping off-road in certain areas is to be "applied with caution" and only after carefully considering the impacts at the local, individual route level. 36 C.F.R. § 212.55 (a), (b). In the DEIS, the Service chose option (4) for the proposed action but ignored its own directive to narrowly and cautiously apply the provision, choosing instead to authorize car camping off-road within 300 feet of every motorized route in the analysis area subject to some limitations that will be nearly impossible to enforce and monitor. This means individuals in the Divide analysis area can drive their cars, OHVs, and motorcycles off-road and off-trail and car camp wherever they want so long as their motor vehicles are within 300 feet (a football field) of a designated road or trail. In effect, the Service's allowance creates 600 foot-wide corridors open to driving and car camping throughout the analysis area. The off-road car camping allowance is not allowed in a few areas but is otherwise not limited to pre-existing access or spur roads, not limited to designated or popular camp sites, and not prohibited or restricted in sensitive areas, including but not limited to secure elk habitat, lynx critical habitat, or some roadless areas. Notably, the Helena National Forest's	

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approach to off-road car camping differs significantly from the approach taken by the neighboring Lewis and Clark National Forest. In the Lewis and Clark National Forest, the Service chose to reduce the 300 foot dispersed vehicle camping prescription to "one vehicle (and attached trailer) length" in response to a barrage of public comments and concerns about how the Agency's decision in the DEIS would, in effect, "create a 600 foot swath down each and every road or trail for vehicles to travel." As explained by one organization: From a management perspective, it will be virtually impossible to prove that someone is not looking for a parking or camping spot. Moreover, this decision will inevitably result in the creation of new roads and trails and result in an enormous amount of natural resource damage. In fact, [the Service's] decision translates into a 600 foot camping/off-road travel corridor for each road and trail in the analysis area. Under any alternative, this decision has the potential to affect over five hundred thousand acres of public land in the analysis area. . . Other members of the public raised similar concerns and requested that the size of the dispersed vehicle camping prescription be reduced or eliminated. After carefully considering these comments, the land-management implications of the 300 foot rule, and the resource damage issues associated with creating 600 foot swaths open to cross-country travel for dispersed vehicle camping, the Service modified the alternatives presented in the draft EIS by shortening the distance from 300 feet to approximately 70 feet (the size of a vehicle and attached trailer). In the Agency's own words: In reaching my decision, I considered the comments on the [draft] EIS, the information contained in the analysis concerning user-created trails, how recreationists use areas to park or turn around, public safety, and the numbers and locations of dispersed camp sites . . . My decision will reduce the creation of new trails out of dispersed camp sites by prohibiting travel off designated routes to a campsite, while still allowing access to continue to the majority of the existing dispersed campsites.	

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The Helena National Forest should follow the Lewis and Clark's lead and adopt a similar approach, one that allows car camping within a reasonable distance of an open road and, in so doing, reins in natural resource damage. If the Service decides to take a different approach than the Lewis and Clark National Forest and go with option (4) and authorize car camping within a 600 foot corridor along every road and trail in the analysis area, as proposed, then it must first carefully consider the impacts (direct, indirect, and cumulative) of that decision pursuant to NEPA and the Travel Rule on the affected resources, including but not limited to soil quality and productivity (the Service, for example, should collect and analyze soil samples from the impacted area and consult and apply its Region One soil quality standards), native vegetation, special management or resource areas, wilderness characteristics, IRAs (including compliance with the Roadless Rule), cultural and historic properties, big game habitat and security (virtually all dead trees within the dispersed vehicle camping corridor will be removed), listed species (grizzlies and lynx, including lynx critical habitat), candidate species (wolverines), and sensitive and management indicator species (MIS) on the Helena National Forest. To date, no such analysis has occurred. Nor has the Service complied with Section 106 of the National Historic Preservation Act (NHPA) to ensure cultural and historic properties within the 600 foot corridor (or on our near roads and trails designated for motorized use under the proposed action) are inventoried, identified and protected prior to authorizing car camping and off-route driving within the 600 foot corridor (or on designated roads and trails). Section 106 of the NHPA is often described as the "stop, look, and listen" provision. Te-Moak Tribe of Western Shoshone Nevada v. USDOI, 608 F.3d 592, 607 (9th Cir. 2010) (citation omitted). Pursuant to Section 106, the Service is required to "take into account the effect of [an] undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register." 16 U.S.C. § 470f. Authorizing car camping off-road within 300 feet of a system route qualifies as an undertaking. So too does designating routes for motorized use pursuant to the Divide Travel Plan.	

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The process begins by defining the "area of potential effects," which in this case includes the area open to dispersed vehicle camping. 36 C.F.R. § 800.16 (d). The Service is then directed to review all existing information on cultural and historic properties within this area (including data on possible yet-to-be identified properties) and seek out additional information from individuals with knowledge of the area, as well as information from local Indian tribes. 36 C.F.R. § 800.4 (a). Based on information gathered from this first, initial step, the Service must then take additional steps "necessary to identify historic properties within the area of potential effects." 36 C.F.R. § 800.4 (b). The Service must make a "reasonable and good faith effort to carry out appropriate identification efforts." 36 C.F.R. § 800.4 (b) (1). To date, no such "reasonable and good faith effort" to identify cultural and historic properties within the area open for car camping has occurred. Nor has such an effort be undertaken before designating routes (roads and trails) for motorized use. In addition, the Service has not carefully considered and applied Executive Order 11644's and the Travel Rule's "minimization criteria" before designating routes for motorized use or authorizing widespread car camping within a 600 foot travel corridor along every route in the analysis area. Executive Order 11644, as amended and strengthened by Executive Order 11989, directs that all areas designated for motorized use on public lands be located to minimize: (1) damage to soil, watershed, vegetation, or other resources of the public lands; (2) harassment of wildlife or significant disruption of wildlife habitats; and (3) conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring lands. These criteria, "known as the 'minimization criteria,' require federal agencies to minimize motorized impacts on public lands." Wildlands CPR v. USFS, – F.Supp. 2d –, 2012 WL 1072351 at *12-13 (D. Mont. 2012); Center for Sierra Nevada Conservation v. U.S. Forest Service, 832 F. Supp. 2d 1138, 1146 (E.D. Cal. 2011) (same).	

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The word “minimize” means to “reduce (something, especially something unwanted or unpleasant) to the smallest possible amount or degree.” THE NEW OXFORD AMERICAN DICTIONARY (2001) at 1087. It does not mean the Service must eliminate all impacts. Use of the word minimize in Executive Order 11644 also does not refer to the total number or overall mileage of routes but to the effects of route and area designations, i.e., the Service must designate areas for motorized use to minimize damage to natural resources and conflicts between uses. Idaho Conservation League v. Guzman, 766 F. Supp. 2d 1056, 1073 (D. Idaho 2011) (citing CBD v. BLM, 746 F. Supp. 2d 1055, 1080 (N.D. Cal. 2009)). The Service’s 2005 Travel Rule codifies Executive Order 11644's minimization criteria by directing the Agency to consider, with the “objective of minimizing” damage to natural resources and conflicts among uses when designating trails and areas for motorized use. 36 C.F.R. § 212.55 (b). While the language may differ somewhat (minimize vs. the “objective of minimizing”) both Executive Order 11644 and the Travel Rule contemplate the “same result.” Guzman, 766 F. Supp. 2d at 1074; Center for Sierra Nevada Conservation, 832 F. Supp. 2d at 1146 (same). Both directives, for example, require the Service to document and explain “how the minimization criteria were applied in the route designation decisions.” Id.; Wildlands CPR, 2012 WL 1072351 at *14 (same); CBD, 746 F. Supp. 2d at 1079-1080 (same). “Simply listing the criteria and noting that they were considered is not sufficient to meet this standard.” Id. Nor is it sufficient to rely on conclusory statements in the record from the Agency or excel spreadsheets and appendices that merely list various routes and why they were included in the system. See CBD, 746 F. Supp. 2d at 1079-1080. Instead, the Service must carefully document and explain how the minimization criteria was applied when making specific route and area designations. Id. No such documentation or explanation is provided in the DEIS regarding the authorization of car camping within a 600 foot wide corridor along nearly every road and trail in the Divide analysis area. Nor is it sufficiently made during the route designation	

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process. The Service says it “minimizes” impacts to resources (and presumably complies with the Executive Order 11644's and Travel Rule’s minimization criteria) by complying with all Forest Plan standards and objectives. This may be true, but the Service must still connect the dots and explain how compliance with specific standards in the Forest Plan (especially new amendments) satisfies its legal obligation to minimize impacts and conflicts. This has yet to occur. In fact, nowhere in the DEIS does the Service adequately explain how it considered and applied the minimization criteria when authorizing a 600 foot travel corridor for car camping off of every designated route in the analysis area. (7) Ensuring the viability of MIS. Under NFMA, the implementing regulations, and the Helena Forest Plan, the Service is required to manage wildlife habitat on the Helena National Forest to ensure viable populations of existing native species are maintained. To do so, the Service identified management indicator species (MIS) for various species groups within the Helena National Forest whose habitat is most likely to be changed by forest management activities. The MIS for the mature tree dependent group, for instance, is the marten. The old growth dependent group is represented by the pileated woodpecker and the goshawks; the snag dependent groups is represented by the hairy woodpecker; the threatened and endangered group includes the grizzly bear (and other species); and the commonly hunted MIS are elk, mule deer, and bighorn sheep. These MIS represent a proxy or surrogate for the health and viability of many other species. While the Service retains some flexibility with respect to the appropriate methodology used to monitor population numbers (actual and trend) of MIS, i.e., using population data on MIS and/or habitat data as a proxy for MIS population data (commonly referred to as the “proxy-on-proxy” approach) the mandate to maintain	

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viable populations of MIS like elk, mule deer, marten, grizzlies and woodpeckers, cannot be ignored. And the methodology employed must be reasonably reliable and accurate. See Native Ecosystems Council v. Tidwell, 599 F. 3d 926, 933 (9th Cir. 2010). If, for example, the Service decides to use habitat as a proxy for population numbers for MIS, then the proxy results must mirror reality. Maintaining the acreage of habitat necessary to maintain viable populations of big game species (elk, deer, and moose) on the Helena National Forest must in fact ensure viable populations are maintained. At the very least, the Service must describe the quantity and quality of habitat that is necessary to sustain the viability of big game species and explain its methodology for measuring this habitat. See Native Ecosystems Council v. Weldon, 848 F. Supp.2d 1207, 1213 (D. Mont. 2012). In the Helena National Forest, the Service uses the big game standards, including Standard #4a, as a means of ensuring compliance with NFMA's viability requirement. Compliance with Standard #4a's hiding cover and road-density standard, for instance, is used as a proxy for population numbers of elk and, as such, other big game species. The proposed action, however, involves eliminating standard #4a and replaces it with an untested standard (never submitted for public review and comment) based solely on size and distance from an open route during the hunting season. Hiding cover for big game and other forest dependent species was eliminated from the big game standard. Because it is untested and eliminates the standard for hiding cover and road-density, there are no assurances that the new standard will work or that the approved Divide Travel Plan will ensure viable populations of MIS are retained on the Helena National Forest. There are no assurances, let alone reasonable assurances, that the new standard – designed to accommodate the travel plan -- is reliable and accurate and will ensure viable populations of elk and other big game	

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species will be maintained. See Weldon, 848 F. Supp.2d at1214-1215. Indeed, under the proposed amendment, a 1,000 clear cut would qualify as "big game security" so long as it is a half mile from a motorized route open during the hunting season. (66-16) (8) Compliance with other forest plan standards. (66-17) Pursuant to NFMA, the Service must ensure that the proposed action is consistent with the Helena Forest Plan. 16 U.S.C. § 1604 (i). If not, then the responsible official must either change the proposed action to bring into compliance with the other standards in the Forest Plan or amend to the other Forest Plan standards. Here, the Service has failed to ensure the proposed action (the new travel plan) and proposed amendment to standard 4(a) which eliminates the existing hiding cover standard for big game security is consistent with the following existing standards in the Helena Forest Plan: • Big game Standard #1 requiring that important summer and winter range for big game species include adequate hiding and thermal cover to support habitat potential. The Service must (but has failed) to explain how the proposed amendment – which does away with the hiding cover standard – will ensure compliance with this important standard; • Big game Standard #2 requiring that an environmental analysis for all project work include a cover analysis at the drainage or EHU level; • Big game Standard #3 directing that elk summer range be maintained at 35% or greater hiding cover and areas of winter range maintained at 25% or greater thermal cover in drainages or EHUs. This standard incorporates all land (private, state, and federal) in the EHU; • Big game Standard #4 directing the Service to implement an aggressive road management program to maintain or improve big game security. The Service must explain how the proposed amendment qualifies as an "aggressive" program to maintain and improve big game security;	

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• Big game Standard #4b stating that elk calving grounds and nursery areas will be closed to motorized vehicles during peak use by elk; • Big game Standard #4c directing that all winter range areas be closed to vehicles between December 1 and May 15; • Big game Standard #5 dictating the minimum size areas for hiding and thermal cover; • Big game Standard #6 stating that the Service will follow the Montana Cooperative Elk-Logging Study Recommendations (Appendix C in the Forest Plan); • Big game Standard #10 stating that moose habitat will be managed to provide adequate browse species diversity and quantity to support current moose populations. Notably, Standard #4a is a big game standard designed to protect habitat for elk, deer, and moose. Mule deer and moose numbers are in decline in western Montana and eliminating standards for habitat cover may make a bad situation worse for these big game species; • The standards, guidelines, and objectives included in the Northern Rockies Lynx Management Direction ("NRLMD"); • The grizzly bear standards included in the Helena Forest Plan, including but not limited to the requirement, in occupied grizzly habitat, to minimize man-caused mortality by limiting the open road density to the 1980 density of 0.55 miles per square mile and the IGBC's open road, total road, and core area standards for grizzly bear habitat; • All standards and monitoring requirements of MIS, including but not limited to all forest (mature, old growth, snag) dependent species and sensitive, threatened and endangered species. Thank you in advance for taking the time to consider the issues and concerns raised in these comments. If you have any questions or wish to discuss these issues, please do not hesitate to contact Helena Hunters (Gary Ingman or Steve Platt) or me at the number below. Sincerely,	

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/s/ Matthew Bishop Matthew Bishop Western Environmental Law Center 103 Reeder's Alley Helena, MT 59601 (406) 324-8011 (tel.) (406) 443-6305 (fax) bishop@westernlaw.org On behalf of: Helena Hunters and Anglers Association Contact: Gary Ingman or Steve Platt 219 Vawter Street Helena, MT 59601 (406) 442- 2705	
67) From: SWayneChamberlin <swchamberlin@yahoo.com> Sent: Monday, June 02, 2014 10:21 AM To: FS-comments-northern-helena Cc: Chamberlin Wayne Subject: Divide Travel Plans To Heather DeGeest and others, I am writing to support the protection and management of the Nevada Mountain roadless area as prospective Wilderness. Specifically I support Alternative 3 which is the result of a collaborative effort among numerous groups, each compromising for an effective, reasonable plan for managing this special area. I hike in Nevada Mountain every summer; I love the flowers, quietude and scenic beauty. At 50,000 acres it offers people in the Helena and Continental Divide area a place to hunt, hike, ride horses and enjoy being alive in this special place. The Gould-Helmville Road is an example of outlaw behavior scarring the land. Just because this trail has been degraded to a road does not make it right; Gould-Helmvillle should be	(67-1) Thank you for your input

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rehabilitated to its former, legal status as a trail along the northern part of the Wilderness Study Area. I appreciate the plans to rehabilitate the Sweeney Creek area after such destruction from motorized vehicles. It's a terrible eyesore now. Thank you. Wayne Chamberlin	
(68) From: Michael Dax <mjdax30@gmail.com> Sent: Monday, June 02, 2014 8:44 PM To: FS-comments-northern-helena Subject: Divide Travel Plan Request Dear Ranger DeGeest, I would like to thank you for rehabilitating the Sweeney Creek Area to be non-motorized and ask that you expand this designation to the CDT (68-1). I have always been an advocate of quiet trails, and my times outside of Montana, where these protections are not possible, have made me realize how important this designation is. Montanans and visitors alike cherish Montana because it is a place where people can still enjoy nature in its entirety, unmarred by the advances of man. It is largely what sets Montana apart from other places around the country, and it is absolutely necessary that we do everything possible to ensure that these opportunities remain possible in Montana. The CDT, especially, is a national treasure and deserves all the protections possible. Not only is it a place for hikers and horseback riders to find solitude, but Montana's unique wildlife depends on the habitat that surrounds it. By protecting it as a non-motorized area, we are also protecting the region's wildlife that few other places outside of Montana possess.	(68-1) Refer to Alternative 5. (68-2)Thank you for your comment.

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Please keep the CDT Wild and non-motorized (68-2). Thank you, Michael Dax Missoula, MT	
(69) From: Gessaman <1kfalcon@gmail.com> Sent: Monday, June 02, 2014 8:11 PM To: FS-comments-northern-helena Subject: Divide Travel Plan Dear Helena District Ranger Heather DeGeest, The Draft Divide Plan allows snowmobiles to depart established use areas near Marysville and roar deep into wild Nevada Mountain, undermining a 2005 winter use agreement and future wilderness consideration in forest plans set for revision in 2015. In the Little Blackfoot, the draft omits a key block of roadless lands traversed by the Continental Divide Trail between Bison Mountain and Upper Ontario Creek from quiet year-round management. The draft wisely proposes to rehabilitate off-road vehicle damaged areas in lower Sweeney Creek but neglects to include the corridor of the Continental Divide Trail in non-motorized area protection (69-1). Please fully protect the Continental Divide Trail and surrounding wildlands by adopting Alternative #3 and CDT corridors as follows: 1 Protect Nevada Mountain wildlands along the CDT by adopting Alternative #3, the only alternative based on a collaborative winter agreement endorsed by the	(69-1) Resource management is a blend of Social economic/political needs balanced with biological/ environmental needs. The preferred alternative we feel reaches this sensitive balance and provides for the public needs as it is providing for environmental concerns governed by law. (69-2) Refer to comments and responses in letter 48.

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Montana Snowmobile Association, Montana Fish Wildlife and Parks and the Montana Wilderness Association in 2005. 2 Protect the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round area protection to all Little Blackfoot Roadless Lands. 3 Expand year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass (69-2). I would also like to take this opportunity to thank you District Ranger DeGeest for rehabilitating vehicle damage in Sweeney Creek as a proposed non-motorized area. Could you also please try extend this quiet area to the CDT? Sincerely, Kathleen, Ron, and Karen Gessaman 1006 36th Ave NE Great Falls, MT 59404 406-452-7106	
(70) From: Tom Kilmer To: FS-comments-northern-helena-helena Subject: Divide Travel Plan Date: Monday, June 02, 2014 9:13:20 AM Attachments: divide travel.pdf Hi. Attached are my comments for the Divide Travel Plan on the Helena National Forest Tom Kilmer 621 2nd Street Helena, Montana	(70-1)The Divide Travel Plan analysis evaluated five different alternatives. The preferred alternative does protect Sweeny Creek, Priest Pass area and the CDT from motorized use. (70-2) Thank you for your input, please refer to Alternative 5. (70-3) Refer to Alternative 5. (70-4) We agree with the comment that roads affecting water quality should be closed. The Hydrology Specialist Report analyzes the impacts of unauthorized routes on water quality and riparian areas. Damage to riparian area soils is addressed by alternative in the Soils Report under the "wet soil and Flood Prone "Landtypes" section. Appendix E in the Final EIS provides

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59601 Thanks so much. June 2014 To: Helena National Forest Divide Travel Plan Hello: Please accept these comments for the record regarding the "Divide Travel Plan" (70-1) 1. Sweeney Creek Area: When my kids were little, back in the 1980s and 1990s we used to hike in this area. We would start at the Sweeney Creek Ecological Trail then branch out exploring this quiet mostly roadless area. A few years ago after not having visited this area in some time I took my granddaughter there for a hike. What a change. The area had become laced with a spider web of unauthorized illegal motorized roads. Trash is everywhere. Trees are shot up. Weeds have taken over. The noise of motor vehicles was prevalent. We soon left. This area needs to be recovered and reclaimed. The best way to do that is to close off all unauthorized motor vehicle routes and make the area non-motorized only. From the forest boundary on the southeast side of the Priest Pass road up to tile top of Priest Pass and down to Mullan Pass road tile area should be off limits to motorized travel. This includes forest lands on both sides of Priest Pass Road. West of the road towards highway 12 and east of the road towards Mullan Pass road tile forest lands should be non-motorized. The Priest Pass Road # 335 should be the only open motorized route (70-2). 2. Priest Pass: On top of Priest Pass you must do something to stop the hill climbing on the open bald hills on the north side of the road. What a mess. Motorized travel	route-by-route information with the proposed designation for each alternative. This route would be closed in Alternative 5. (70-5) Refer to Alternative 5. (70-6) The Divide Travel Plan analysis evaluated five different alternatives. The preferred alternative does protect Nevada Mt and FR 136-D1 from motorized use. (70-7)Refer to Alternative 5. (70-8) Refer to Alternative 5. (70-9) Refer to Alternative 5. (70-10) Refer to Alternative 5.

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there serves no purpose. The CDT from Priest Pass to Mullan Pass is currently open to trail motorcycles. To insure a quiet non —motorized experience on the CDT this trail should be non-motorized only. This would be in keeping with Northern Region directives for the CDT. There are some fragile wet meadows in there that get ablaze with Blue Camas flowers (70-3). This is best enjoyed during a non-motorized visit to protect the resource and the quiet beauty. In section 13 Township 10 North, Range 6 West there is a short road heading north down a wet drainage. The road is dead end; it leads to no specific feature and serves no purpose. Motor vehicles in this wet north facing drainage cause rutting and stream disruption. Please close and reclaim it (70-4). 3. CDT from MacDonald Pass to Priest Pass. The trail here has some nasty, muddy, wide segments of motor vehicle damaged roads. This segment needs to be non-motorized only. This would protect resources, prevent trail damage and provide a quiet hiking or horseback experience. You should work with local and national groups to get a nice single track trail in this area (70-5). 4. CDT. The trail here heading north from Dana Springs should be designated as non-motorized only. You should put a gate and trail head right at road 136 in Section lO, Township il North, and Range 7 West. The trail here leads into some nice wildlands in the Black Mountain area. To protect resources and provide a quiet non-motorized CDT experience this would be a wise choice (70-6). 5. CDT from Mullan Pass heading north. I strongly encourage you to close some of the redundant roads here and consolidate motorized travel on a couple of essential roads. Then restrict CDT travel to non-motorized use only. Try to find a route for a single track segment or work with some existing roads and narrow them down to trails (70-7). 6. CDT north from Bullion Parks to the existing single track CDT north of Jericho Mountain. Close this mess of rutted, water holed, jeep road. Motorized vehicles have made a mess of this area. Please restrict this route to non-motorized use only	

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(70-8). 7. CDT in general. I urge you to protect not only the CDT as a non-motorized trail but to also provide a corridor on either side of it that is closed to motorized use. This would help protect the trail and also provide a non-motorized buffer zone to protect wildlife and scenic beauty (70-9). 8. Roadless Areas. The Jericho Mountain and Electric Peak Roadless areas should be managed for non-motorized use year round. There are plenty of roaded areas for motorized travel. Protect these small roadless gems for wildlife and non-motorized travel enjoyment (70-10). Thanks so much. Tom Kilmer 621 2nd Street Helena, Montana 59601	
(71) From: Addrien Marx <lamarx@blackfoot.net> Sent: Monday, June 02, 2014 1:45 PM To: FS-comments-northern-helena Subject: Three critical areas to protect along the Continental Divide Trail PLEASE!!! You have the ability to preserve special and unique places that cannot be lost along the CDT! These places cannot be re-established if lost, cannot be valued more than how they exist now! These are those areas for your consideration: 1. Protect Nevada Mountain wildlands along the CDT by adopting Alternative #3, the only alternative based on a collaborative winter agreement endorsed by the Montana Snowmobile Association, Montana Fish Wildlife and Parks and the Montana Wilderness Association in 2005.	(71-1) Refer to comments and responses in letter 48.

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2. Protect the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round area protection to all Little Blackfoot Roadless Lands. 3. Expand year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass I also want to thank District Ranger DeGeest for rehabilitating vehicle damage in Sweeney Creek as a proposed non-motorized area and ask that she extend this quiet area to the CDT(71-1). Again, I am grateful for your consideration and so hope that the long term value, the connection for our children, and the ability to keep these critical areas intact….finds a positive conclusion in this process. I wish I had the words - but the depth and the commitment to these areas run strong here in the Seeley Swan and those that utilize the CDT! Addrien Marx Rovero's Seeley Lake, MT	
(72) From: Addrien Marx <lamarx@blackfoot.net> Sent: Monday, June 02, 2014 1:45 PM To: FS-comments-northern-helena Subject: Three critical areas to protect along the Continental Divide Trail PLEASE!!! You have the ability to preserve special and unique places that cannot be lost along the CDT! These places cannot be re-established if lost, cannot be valued more than how they exist now! These are those areas for your consideration: 1. Protect Nevada Mountain wildlands along the CDT by adopting Alternative #3, the only alternative based on a collaborative winter agreement endorsed by the Montana Snowmobile Association, Montana Fish Wildlife and Parks and the	

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Montana Wilderness Association in 2005. 2. Protect the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round area protection to all Little Blackfoot Roadless Lands. 3. Expand year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass I also want to thank District Ranger DeGeest for rehabilitating vehicle damage in Sweeney Creek as a proposed non-motorized area and ask that she extend this quiet area to the CDT(72-1). Again, I am grateful for your consideration and so hope that the long term value, the connection for our children, and the ability to keep these critical areas intact….finds a positive conclusion in this process. I wish I had the words - but the depth and the commitment to these areas run strong here in the Seeley Swan and those that utilize the CDT! Addrien Marx Rovero's Seeley Lake, MT	(72-1) Refer to comments and responses in letter 48.
(73) From: Clint Nagel <clint_nagel@yahoo.com> Sent: Monday, June 02, 2014 11:53 AM To: FS-comments-northern-helena Subject: comments on the Divide Travel Plan along Continental Divide in the Helena National Forests Thank you for giving me this opportunity to comment on the proposed management plan along the Continental Divide in the Helena National Forests. There are ten wild lands located along the 100 mile swath bordering both sides of the Continental Divide from Thunderbolt to Scapegoat Mountain in the Helena National Forest. Most of these lands have long been connected by the Continental Divide National	

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Scenic Trails since 1978 in order to provide quiet recreation and to promote conservation. We need to honor that original intent. This is why I support Alternative 3 of the Divide Travel Plan (73-1). This is the non-motorized option which says these lands should remain non-motorized year round. This includes the proposed wilderness of Nevada Mountain, the recommended wilderness of the Electric Peak and adjoining lands including Bison Creek and all lands along the Continental Divide form Priest Pass to MacDonald Pass. This proposal was a collaborative effort among several, several organizations representing conservationists, outdoorsmen, mountain bikers and equestrians alike. I urge you to take these thoughts and comments in mind and thank you for allowing me to comment. clint nagel 1385 Golden Gate Ave Bozeman, MT 59718	(73-1)Thank you for your comment.
(74) From: Barry Brown <barrynbrown@yahoo.com> Sent: Tuesday, June 03, 2014 2:08 PM To: FS-comments-northern-helena Subject: Continental Divide Trail Dear Heather DeGeest, Helena District Ranger, I have lived in Montana for almost 25 years and I highly value wilderness and wild, roadless places. I would like to respectfully ask you to fully protect the Continental Divide Trail (CDT) and surrounding Wildlands by adopting Alternative #3: Protect Nevada Mountains wildlands along the CDT based on the collaborative	(74-1) Refer to comments and responses in letter 48.

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winter agreement Protect the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year round protection to all Little Blackfoot Roadless lands Expand year round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass to Mullan Pass (74-1). Thank you for considering this. And for rehabilitating vehicle damage in Sweeney Creek as a proposed non-motorized area. Please extend the quiet area to the CDT. Best Regards, Barry Brown 737 E. Beckwith Ave. Missoula, MT 59801	
(75) May 24, 2014 Transcribed hand written letter Received June 3, 2014 Dear Sir or Madam: As I grew up as a young man in Illinois I yearned for something more. Agriculture has wiped out our once wild prairies and forest, predator control has extricated all of our top tier species and a forest of only 1000 acres is seen as an enormous tract of public land. This altercated land forced me to move out west when I was eighteen. Arizona and Colorado were the first places I went. I was then when I thought I had found what I was looking for. But over time I discovered these places were mere shadows of what they once were. They no longer hold the howl of the wolf or presence of the grizzly. It was not until I hiked beneath the Chinese Wall, lost myself in the Absaorka Beartooth, and saw my first grizzly bear in Yellowstone when I realized what I and millions of Americans had been missing. I personally	(75-1) Thank you for your comments.

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fell that it is our moral obligation to maintain this wild wealth of Montana. I understand that the Forest Service is always under scrutiny in any decision they make. However, I ask you to not let this deter you from making the right choice. I ask for your support in the non-motorized prescription in Alternative 3, and designating Nevada Mountain and Electric Peak as Wilderness. Thank you for taking the time to read, Zachary Cardosi (815)549-3139 zmcardosi@gmail.com	
(76) From: Carrie <exrsize168@aol.com> Sent: Tuesday, June 03, 2014 12:43 PM To: FS-comments-northern-helena Subject: NEVADA MOUNTAN PROTECTION Dear Helena District Ranger Heather DeGeest, Sending my support for the Continental Divide Trail and adopting Alternative #3. Please help to protect these areas and to adopt Alternative #3. This was based on an agreement by the MT Snowmobile Assoc., MT Fish Wildlife and Parks and the MT Wilderness Assoc. in 2005. Could you please help to extend the non-motorized year round protection to the Little Blackfoot Roadless Lands, which would help the corridor between Bison Mountain and the headwaters of Ontario Creek. Last, but not least, expand year round non-motorized protection to the CDT corridor from MacDonald-Priest Pass, Priest Pass to Mullan Pass (76-1). Thank you so much for repairing vehicle damage in Sweeney Creek and for all your hard work and efforts! Sincerely, Carrie Palmer	(76-1) Refer to comments and responses in letter 48.
(77)	(77-1)Thank you for your comment.

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From: dblank1@cyberport.net Sent: Wednesday, June 04, 2014 5:12 PM To: FS-comments-northern-helena Subject: Divide Travel Plan Dear Ranger DeGeest, I am concerned about motorized use on the Continental Divide. Please adopt alternative 3(77-1). These areas should be non-motorized all year, including winter: Bison Mtn to Ontario Creek drainage, and MacDonald Pass to Mullan Pass, including Priest Pass. Sincerely, Dee Blank Whitefish, MT	
(78) From: greg munther <munther@bresnan.net> Sent: Wednesday, June 04, 2014 8:22 PM To: FS-comments-northern-helena-helena Subject: Divide Travel Plan and Elk Amendment DEIS Comments from MT BHA Attachments: Divide DEIS Response w ltrhd June 2014.doc Helena NF: Attached are Montana Backcountry Hunter and Angler comments regarding the DEIS for Helena NF Divide Travel Plan and Elk Amendment. Please acknowledge via return email receipt of this document. Greg Munther Life's journey is not to	

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arrive at the grave safely in a well preserved body, but rather to skid in sideways, totally used up and worn out, shouting '...man, what a ride!' George Carlin 295 Lena Lane Missoula, MT 59804 June 5, 2014 Helena National Forest Attn: Divide Travel Plan 2880 Skyway Drive Helena, MT 59602	

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comments-northern-helena-helena@fs.fed.us Subject: Draft Environmental Impact Statement for Travel Management Planning and Forest Plan Amendments for the Divide Area of the Helena National Forest Montana Chapter of Backcountry Hunters and Anglers is comprised of Montana hunters and fishermen who value quality fish and wildlife habitat and maintenance or enhancement of traditional non-motorized hunting and fishing opportunities. Many of our members hunt and fish almost exclusively on public lands, and many focus on the National Forest lands in the Divide travel plan area. We have a deep commitment to protection of wildlife and fisheries habitats and traditional non-motorized hunting and fishing not only for the present, but to assure equal opportunities for our children and their children. We request each of our comments be individually and thoroughly addressed in the process and be entered into the public record in their entirety. Montana BHA has previously commented on this process as early as 2008(78-1).	
The Divide Travel Plan process is a rare opportunity to move the Helena substantially toward meeting the Helena Forest Plan goals, objectives, and standards. In contrast, most day to day Forest Service business has only minor effects moving toward meeting the goals, objectives and standards of the Helena Forest Plan. Forest Plan Direction appropriately focuses heavily on management of the road and trail network for most Forest Plan goals, objectives and Standards. Most of the adverse effects of man's activities on the Forest resources are related to roads, trails, and use associated with them.	(78-1) Thank you for your input
BHA Issue: It is imperative that the Forest only retain the most essential roads and trails in choosing a final Plan, and take this opportunity to minimize the road and motorized trail network (78-3). This direction is clear in the current National Forest Service Travel Plan Policy (FSM 7710) directing a minimal network, and especially appropriate given the Forest's acknowledgement of transportation maintenance shortfall and even lower budget expectations in the future. The objectives of this	(78-3) Resource management is a blend of Social economic/political needs balanced with biological/ environmental needs. The preferred alternative we feel reaches

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travel plan process must thoroughly address "FSM 7710.13. " To determine the minimum road system needed for sustainable public and agency access to achieve the desired conditions in the applicable land management plan; to promote ecosystem health; and to address public safety and efficiency of operations in an environmentally sensitive manner within current and anticipated funding levels" (emphasis added). In the DEIS, the Helena only considers four, closely related alternatives for the proposed action: (1) a "no action" alternatives which represents the existing baseline and authorizes motorized use on 286 miles of roads without seasonal restrictions (the existing baseline should only include routes designated for motorized use, not user-created two-tracks never authorized for motorized use); (2) the proposed action which authorizes motorized use on 284 miles roads without seasonal restrictions; (3) alternative three which authorizes motorized use on 262 miles roads without seasonal restrictions; and (4) alternative four which authorizes 265 miles of roads without seasonal restrictions. In the entire 155,500 acre planning area, therefore, the Service does not consider and analyze a single alternative that authorizes motorized use on less than 262 miles of roads. Most of the acreage open for over-snow motorized vehicle use in the alternatives is also very similar. Given the critical importance of the Divide area to wildlife (big game, grizzlies, wolverine, lynx) and wildlife connectivity in the region, and the adverse impacts associated with roads and high road density and over-snow motorized use (especially for denning wolverines), analyzing an alternative that authorizes motorized use on less than 262 miles of roads and less acreage for over-snow motorize use is necessary and required by NEPA. Of course, all action alternatives allowing any number of vehicles to leave the roadway anywhere along its length for up to 300 feet fails to meet minimization criteria discussed above. We also believe a 300 foot allowance would be difficult, if not impossible to enforce, and would likely not be enforced due to inability to prove a person was not looking for a camping spot. Is one track now a road for others to legitimately follow…or is it two passes…or three? In addition, travel enforcement on the Helena rarely occurs, and therefore it is unlikely to improve in the future. We see no discussion specifically how motorized travel enforcement will	this sensitive balance and provides for the public needs as it is providing for environmental concerns governed by law. Preferred alternative does address the parking and dispersed camping issue. A clear and concise travel plan decision will aid in the enforcement and conviction of travel plan violations. (78-4) Refer to Alternative 5.

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improve in the future (78-4). BHA Issue: The No Action Alternative (Alt 1) inappropriately includes user created routes as the baseline condition. It is required by NEPA and case law that only the designated transportation system be used as the baseline condition to accurately compare and disclose impacts of each alternative relative to this baseline. We request the No Action Alternative not include undesignated routes to describe the Alternative nor compare impacts of the other alternatives. BHA Issue: We also emphasize that the Travel Management Rule and Executive Orders 16644 and 11989 (EOs) have specific requirements to address. Unlike NEPA, which requires agencies to assess environmental consequences of their decisions but does not obligate agencies to take actions that minimize those consequences, the Travel Management Rule requires the Forest Service to aim to minimize environmental damage when designating routes. Therefore the Helena must consider the "minimization" criteria set out in 36 C.F.R. § 212.55(b) and document how the agency applied the criteria in its designations on the record. The language "with the objective of minimizing" means that the whole goal or purpose of the exercise is to select routes in order to minimize impacts in light of the agency's other duties. Simply listing the criteria and noting that they were considered is not sufficient to meet this standard. Instead, the Forest Service must explain how the minimization criteria were applied in the route designation decisions. Executive Order 11644 directs minimizing effects on resources and other users: (1) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands. (2) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. (3) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors (78-5). The interpretation of "minimizing" as discussed in DEIS Summary page 8 fails to	(78-5)- The addition of the roads to the Forest System was analyzed as part of the effects analysis in the Hydrology Resource Report and is discussed in the Environmental Consequences section. The effects to water quality associated with the adoption of unauthorized routes are minimal for each action alternative and are offset by the potential of future road decommissioning afforded by this decision. A route-by-route analysis for roads added to the travel system is available in the project record. Many of the road and motor trail closures in action alternatives have been driven by site-specific conflicts with wildlife. See, for example, narratives in the Wildlife Background Report, "Local Effects in key Areas" (p. 242-282). Resource management is a blend of Social economic/political needs balanced with biological/ environmental needs. The preferred alternative we feel reaches this sensitive balance and provides for the public needs as it is providing for environmental concerns governed by law. (78-6) Thank you for your input

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meet national Forest Service direction. The DEIS has not demonstrated how it has minimized damage to soil, watersheds, vegetation, harassment of wildlife and significant disruption of wildlife habitats, nor conflicts of motorized use with other recreational uses. "Diminish impacts" or "moving toward goals and objective" is not minimizing. Minimizing means you must address why each route to be left open to public motorized travel that damages soil, watersheds, vegetation (including noxious weed spread), disruption of wildlife habitats or other recreational uses is indeed necessary, and use cannot be avoided (78-6). BHA Issue: The application of direction contained in the Travel Planning policy is not thoroughly reviewed or specifically addressed. FSM 7710 is described as "Requires travel analysis (FSH 7709.55, ch. 20) to inform decisions related to identification of the minimum road system (emphasis added) needed for safe and efficient travel and for administration, utilization, and protection of National Forest System (NFS) lands per 36 CFR 212.5(b) and to inform decisions related to the designation of roads, trails, and areas for motor vehicle use per 36 CFR 212.51. The selected final travel plan must comply with the FSM 7710 of minimizing the roads network on the Forest, and a discussion of compliance with the policy included in the NEPA documents including the FEIS.	
BHA Issue: Proposing adoption of a Travel Plan preferred alternative that is only compliant with the current Forest Plan elk standard if a speculative elk security amendment is adopted is therefore 1) premature, 2) inappropriate and 3) illegal. The resulting NEPA elk security analysis and conclusions for this travel plan inappropriately tiers off this speculative and unapproved elk security amendment that has not had analysis nor public review, and therefore is non-compliant with NEPA. We find the proposed elk security amendment's application inappropriate and without science base, has been peer reviewed or concurred by recognized elk scientists (including the authors of the Hillis Paradigm paper), does not incorporate the most current elk science, and has not been validated for being appropriate for use on Divide landscapes. The authors of the Hillis Paradigm have questioned (we have their letter on file)(78-7) the application of the Hillis Paradigm for application	(78-7) This letter suggests that "…applying the paradigm to eastside forests with typical open forest cover types…would be imprudent without first doing some formal review with local biologists and researchers familiar with the unique harvest situations on the eastside." To that end, the parameters in Alternative B were developed with MFWP and reflect the broader collaborations outlined in MFWP and USDA Forest Service (2013) to which Jack Lyon contributed (See that document, contributors section). (78-8) The Forest Plan amendment, Alternative B, includes a

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in the Divide Travel Plan area, yet the Hillis Paradigm is the premise for Amendment Alternative B. The proposed application is does not reflect current scientific knowledge on elk response to hunting pressure nor all-terrain vehicles. For example, Wisdom (2007) found elk displaced up to 0.93 miles from the presence of an all-terrain vehicle, yet the Hillis Paradigm includes hunting security areas as little as ½ mile from an open road or ORV trail. We note the authors of the Hillis Paradigm caution that the Paradigm was developed only for densely vegetated west-side Montana landscapes and cautioned its applicability to other landscapes. The proposed application of the Hillis Paradigm becomes even less appropriate as the forest becomes thinner due to tree mortality, which the Forest has acknowledged has and continues to occur. Thus the effectiveness of a 250 acre patch size for elk security is far less effective in thin or thinning stands of canopy when hunters can see much further than the thickly multistoried stands of timber found on the Lolo when the Paradigm was developed. Elk in thinner canopies also feel less secure, move with less disturbance and move further distances away from disturbance (78-8). We assert that lack of cover can be compensated only by increasing distance from roads. That means only an Alternative that truly minimizes open roads and does so to create large security areas can be effective. We find Alternative 2 fails to provide sufficient elk security as well as does not minimize the Divide road system. BHA Issue: Proposing a preferred alternative dependent on a yet unapproved forest plan amendment is premature and does not comply with intent of NFMA nor planning regulations. To meet law, policy, and direction we request either 1) the elk security standards remain unaltered, or that, 2) before any Travel Plan (including the current proposal) is developed, that any elk security amendment proposed utilizes the knowledge of the West's recognized independent elk scientists and use of the most current elk science In other words, the current process has the cart before the horse, and the process does not meet the National Forest Management Act, current National Forest Planning Regulations nor NEPA.	discussion of adjustments made to Alternative B to account for eastside conditions. "Factors that increase the effectiveness of security areas include large size, plentiful forest cover, minimal trails and old roadways, rugged terrain, and heavy deadfall, and so on. All of these factors may influence the ability of an area to hold elk through the hunting season; through collaboration with MFWP, the key component was determined to be size. Accordingly, the minimum size of an "elk security area" was set at 1,000 acres—considerably larger than the 250 acre minimum recommended by Hillis et al. (1991) for "Westside" forests. This is an adjustment for "eastside" cover conditions…" See Alternative Description/Alternative B/Discussion.

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BHA Issue: Of the two action alternatives, we find that Alternative 3 or 4 moves the Divide Travel Plan area closer to meeting Helena Forest Plan direction, including goals, objectives and standards than Alternative 2. We support Alternative 3 as the better of the action alternatives, but believe all action alternatives are deficient in meeting laws, regulations and the Helena Forest Plan's goals, objectives and standards." We find the Preferred Alternative 2 in conflict with many aspects of the Forest Plan as described in more detail below, and therefore another Alternative must be developed/adopted to meet the current Forest Plan. Appendix A- Forest Plan Direction The Forest Plan includes direction for road and trail management and provides important guidance for this project. Forestwide direction that is applicable to this project includes: Goal 15 (Forestwide II/2) – Develop and implement a road management program with road use and travel restrictions that are responsive to resource protection needs and public concerns BHA Issue: We find that the direction to be "responsive to resource protection needs" has not met. There has been no onsite analysis or trail condition survey of user created trails selected for adoption into the transportation network in Alternative 2, therefore the Forest cannot attest to whether these proposed routes meet Forest Plan requirements, the Clean Water Act, bull trout, INFISH, nor direction for impaired watersheds. A thorough analysis would specifically perform onsite inspections and then describe how each route segment affects water quality standards, riparian health nor site specific wildlife and fisheries effects. How will user created routes not selected for adoption be treated to assure motorized travel will cease and resource impacts from these disturbed areas be rehabilitated? (78-14) BHA Issue: We fail to find how permitted use of tracked vehicles on closed routes	(78-14)The addition of the roads to the Forest System was analyzed as part of the effects analysis in the Hydrology Resource Report and is discussed in the Environmental Consequences section. The effects to water quality associated with the adoption of unauthorized routes are minimal for each action alternative and are offset by the potential of future road decommissioning afforded by this decision. A route-by-route analysis for roads added to the travel system is available in the project record. (78-15)Thank you for your comment. (78-16) Refer to Alternative 5.

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does not have the same adverse effects as other vehicles on wildlife displacement, user conflict and elk security. We request tracked vehicles be treated the same as other motorized vehicles regarding closures (78-15). BHA Issue: We found both action alternatives non-responsive to several aspects of resource protection needs. For example, we object that dispersed camping is allowed up to 300 feet from any authorized route in both action alternatives. Permitting off route travel over a band of 300 feet each side of the route invites additional resource impacts without site specific potential impact analysis (78-16). A wide range of alternatives would have, in at least one Alternative, considered prohibiting all motorized travel in Inventoried Roadless Areas, except for valid mining activity or restricted access to private land inholdings. Objectives, Facilities (Forestwide II/6) Transportation facilities such as roads and trails will be constructed, managed, and maintained to cost effectively meet the Forest land and resource objectives and visitors' needs. The Forests transportation system will be coordinated and integrated with public and private systems to the fullest extent possible....soil and water conservation practices will be applied...to ensure that Forest water quality goals will not be degraded BHA Issue: Alternative 2 as the preferred Alternative proposes to add 10 miles of user created routes into the system without a site specific analysis of the resource impacts of proposed routes to soil, water and wildlife and fish, current cost of relocation or reconstruction of such routes to bring them in compliance with water quality and fisheries standards and objectives(78-17). We also note that adopting an expanded user created network of routes into the transportation is fiscally irresponsible to the objective of managing for cost effectiveness when elsewhere in the document the Forest acknowledges projection of an even smaller transportation maintenance budget in the future. The expectation of cost effectiveness, meeting resource objectives including soil and water conservation in face of a declining transportation maintenance budget mandate would strongly suggest shrinking the transportation network to be within the expected maintenance budget. Additionally, the Plan	(78-17) The addition of the roads to the Forest System was analyzed as part of the effects analysis in the Hydrology Resource Report and is discussed in the Environmental Consequences section. The effects to water quality associated with the adoption of unauthorized routes are minimal for each action alternative and are offset by the potential of future road decommissioning afforded by this decision. A route-by-route analysis for roads added to the travel system is available in the project record. Alternative 5 would add 1.1 miles of roads within Riparian Habitat Conservation Areas, and 3 open stream crossings to the HNF system. At this point, Alternative 2 is no longer the "preferred alternative". The effects of user-made routes to the wildlife resource in this alternative has been made is several "Environmental Consequences" subsections in the Wildlife Background Report and equivalent sections in the FEIS. See, for example, "Connectivity and Fragmentation" (p. 43), "Elk" (p. 164, 170), "Grizzly Bear" (p. 188), "Spotted dog Creek-Baldy Ridge" (p. 246-247), "Negro Mountain" (p. 250-251), "Upper Telegraph Creek" (p. 255-256), "Upper Ontario-Bison Creeks" (p. 259-260), "Slate Creek-Elliston Creek" (p. 268-270). (78-19) Alternative 2 is no longer the preferred alternative.

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ignores the avoidable risk to trail user safety when there is a degraded transportation network larger than the expected maintenance budget. Forestwide Standards, Facilities – Road Management (Forestwide II/3132) the criteria to be used for road, trail or area restrictions are safety, resource protection, economics, conflicting uses, facility protection, public support, land management objectives. BHA Issue: The Preferred Travel Plan Alt 2 ignores the needs for visitor safety, facility protection and economics when the preferred (Alt 2) transportation network is larger than the expected maintenance budget. This plan appears to invite Forest users to use a network that will have inadequate maintenance on most of its routes. The resulting deteriorated condition is contradictory to this Standard with regard to issues of safety and resource protection. This Forest's preferred alternative appears to invite Forest users to use an expanded transportation network that will not have adequate maintenance on most of its routes, which is certain to contain safety hazards and create additional resource impacts(78-19).	(78-20)Thank you for your input.
BHA Issue: We object to the concept that this DEIS does not identify roads for decommissioning and will require yet another NEPA process before initiating any decommissioning (DEIS summary page 1). Road closure prescriptions are connected actions to this travel plan effort and must be displayed in this process. An analogy is a timber sale NEPA decision that states logging will occur, but the silvicultural treatment prescriptions will require a separate NEPA decision. Given the size of a separate NEPA task, it is unlikely many roads affected by this travel plan will have proper treatment if a separate NEPA process is required (78-20).	(78-21) Refer the Hydrology and Soils specialist report. The Divide Travel plan only determines open and close status of routes. Future site specific analysis will be completed to determine closure methods.
The pubic cannot assess how effective a closure might be in both restricting motorized travel, but also whether a roadway will serve as a hunter conduit, thus reducing the effectiveness of big game security.	(78-22)Thank you for your input.

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Without decommissioning the merely "closed" roads is contradictory to watershed and soils objectives, as they remain as substantial risks to failure or chronic bleeding sediment We believe most year-long closed roads should be decommissioned, unless there is an ongoing or scheduled project. Cost of decommissioning is less than properly maintaining a "closed" road over a short few years. Decommissioned roads will also have less sediment, less risk to failure, far fewer motorized violations, less fragmentation of wildlife habitat and will no longer serve as effective conduits of hunters and others into secure elk security areas (78-21). BHA Issue: Preventing or enforcing illegal and renegade travel on roads simply gate closed to motorized use is also difficult to enforce, as they are easy conduits for motorized vehicles, even if a gate or other single closure device is in place. They could intersect other motorized routes which allow motorized users to physically access an otherwise "stored" road. Stored roads are easy conduits to enable non-motorized hunter's easy access into otherwise secure big game habitats. By serving as walking, mountain biking or horse travel conduits, closed roads reduce the effectiveness of elk security. We request all roads proposed for "closure" be instead planned for decommissioning unless a scheduled project needing the road is on the planned project schedule, and that the road use be conditional on decommissioning once the project is completed(78-22). We request that specific road treatments be identified for each road segment included as a "closed' road (78-23).	(78-23)Outside the scope
4a. Road management will be implemented to at least maintain big game habitat capability and hunting opportunity. To provide for a first week bull elk harvest that does not exceed 40 percent of the total bull harvest, roads will be managed during the general big game hunting season to maintain open road densities with the following limits. The existing hiding cover to open road density ratio should be determined over a large geographic area, such as a timber sale analysis area, a third order drainage, or an elk herd unit.	(78-24) An alternative was considered but not carried forward to test the efficacy of closing all Forest Roads in order to achieve consistency with Standard 4a. That analysis concluded that "5 out of 6 EHUs would meet Standard 4a (compared with 4 out of 6 in Alternative 5, the most aggressive Alternative in terms of road closures during the hunting season). Although that analysis indicates that it's possible for the Forest to close enough roads in

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4a (response) one out of 6 herd units currently meet Standard 4(a) (DEIS Summary p 30). BHA Issue: At least one Travel Plan alternative "to address this situation" must include proposed motorized restrictions to meet this standard. There is no DEIS discussion describing what motorized transportation network existed when the Helena Forest Plan was initially approved in 1986, nor how close the Divide was to meeting the elk security standard at that time of initial plan implementation. Did previous project decisions since the 1986 Plan approval include timber sales, special use permits and transportation decisions properly address how these decisions address meeting Standard 4A? Or did the failure to address in these project decisions cumulatively aggravate the present depleted elk security situation? If so, then why should the Forest propose or be permitted to now "kick the can down the road" by proposing a more lenient elk security standard instead of correcting the cumulative effects of previous Forest Service decisions that took the Forest further away from meeting the elk security standard?(78-24) BHA Issue: The 4a effects discussion inappropriately relies on an assumed adoption proposed elk security amendment that has not benefited from public review or comment. It appears this reliance predisposes the elk amendment decision as necessary without Alternative elk security amendments being proposed. Relying on a 20+ year old untested "Hillis Paradigm) as the basis for an elk security amendment ignores (1) use of 20 years of elk security research conducted since the late 1980s and 2) caution by the authors of the Hillis Paradigm paper that it was developed for use on west side heavily vegetated landscapes and is not applicable to other areas. In addition, the Helena's acknowledgement that forest vegetation is thinning due to insects and disease lends even more doubt that the Hillis Paradigm is appropriate for a naturally thinner vegetative pattern with larger natural openings and a thinning vegetative condition and trend. Why were no other potential elk vulnerability standards using more recent science neither analyzed nor proposed?	the Quartz Creek EHU to achieve compliance with Standard 4a, several of those road miles over which the Forest has discretion are located outside of the Travel Plan project area and have already been subject to a travel plan decision (i.e. Clancy Unionville Vegetation Manipulation and Travel Management Project). The few miles of open roads in Quartz Creek EHU that could be closed as part of the Divide Travel Plan decision access private land. The Greenhorn EHU would remain out of compliance with Standard 4a because the Forest simply does not have sufficient road closure discretion. Even if it were possible to close all of the roads in the project area (several miles of roads are outside of the Forest Service's jurisdiction), some of the concerns identified by MFWP in the Montana Final Elk Management Plan (MFWP 2005) would not be ameliorated especially in those HDs where access to elk is a management concern". See the Forest Plan amendment Findings Required by Laws, Regulations, and Policies/National Environmental Policy Act/Comparison of Alternatives/Alternative A/Discussion and Chapter 2 of the FEIS. Also, based on updated data, three of the six herd units in the Travel Plan area currently meet Standard 4a which counters the comment that past management has compromised the Forest's ability to meet Standard 4a. See the Forest Plan amendment, Changes between Draft and Final section and Findings Required by Laws, Regulations, and Policies/National Environmental Policy Act/Comparison of Alternatives/Alternative A section. (78-25)The Forest Plan amendment provides ample documentation on the relevance of the security methodology to recent science. "The underpinnings of this methodology – i.e. elk tend to avoid open motorized routes during the hunting season - has been well documented in the scientific literature and

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We also object that the bulk of seasonal closures related to 4a will begin October 15 rather than Sept 1 as recommended by Eastside Biologists, and now generally accepted as necessary to reduce displacement (of elk) to private lands.(78-25) 4b. Elk calving grounds and nursery areas will be closed to motorized vehicles during peak use by elk. Calving is usually in late May through mid-June and nursery areas are used in late June through July. BHA Issue: Elk calving grounds and nursery areas have not been mapped nor addressed as how this Travel Plan protects these as directed (DEIS p 256) in the Forest Plan. There is no indication nor documentation the Forest used available knowledge or data in determining where calving and nursery areas are known to occur. Did the Forest consult or specifically request such calving or nursery site specific information from MDFWP or local forest users?(78-26) We are certain that some such information is available, but this Standard is dismissed with the above blanket response. Calving areas are usually associated with certain elevations and openings or thinner canopies, and nursery areas are commonly associated with wetter or mesic meadow habitats. Even if there is some variability in specific use areas from year to year, known areas "will be closed during peak use". Even minor human use during key use times likely displaces elk from these biologically preferred areas. The Forest Service routinely has road or route closures for wet road conditions, snowmobiling conflicts, avalanche hazards, and even winter ranges, even though conditions favorable to those conflicts do not occur each and every year. This Standard requires that this travel plan project close such known calving and nursery areas during the expected elk use times. If the Forest cannot assimilate and apply site specific known calving and nursery information, it is appropriate to close all associated habitat types and conditions favorable to calving and nursery until such elk use maps can be developed. In addition, prior and existing motorized use may have displaced elk from their traditional calving or nursery areas therefore likely habitats or previously used calving and nursery areas must be given priority for removing motorized uses.	reinforced through the work of Unsworth and others (1991, 1993), Rowland and others. (2000, 2005), and Proffitt and others (2013), to name just a few." (See the section "The Concept of Elk Security".) (78-25)Alternative B, as developed for the final EIS, reflects this comment by defining elk security as "a proportion of an elk herd unit within the administrative boundary of the Helena Ranger District that consists of an area of at least 1000 acres in size that is at least ½ mile from a motorized route open to the public between 9/1 and 12/1" (See Alternative Description/Alternative B). (78-26)Alternative 5, modified, includes road closures that will protect elk calving and nursery areas that were identified through the public comment process (See Draft ROD). (78-27)This issue is discussed in the Wildlife Background Report along with steps being taken to protect these habitat components on elk summer range (p. 47-49, 162-163). Alternatives vary in the degree to which they subtract motor routes from these sites (p. 164-165). Specific examples are provided in the sections on "Local Effects in Key Areas" (p. 242-282).

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BHA Issue: Christensen, et al (1993) state that key summer range elements are "Wet drainage heads, saddles, riparian habitats, shadowed draws with cool air movement, and wet meadows are some examples of special features. In many areas these features support a disproportionate level of elk use and contribute significantly to overall elk use of a larger area. Generally, these sites are highly desirable for forage, water, temperature regulation, movement, or a combination. Such sites should be recognized and protected in prescriptions that deal with elk summer range (emphasis added)."(78-27) Because the Helena indicates they do not have more refined calving and nursery areas identified site specifically, all proposed motorized routes must be screened for the above habitat features and closed during late spring and summer to comply with Standard 4b. DEIS Summary p 38. "Montana Department of Fish, Wildlife, and Parks data indicate that elk populations in the Divide landscape are either at or near population objectives of the Montana Elk Plan (2004) for the last several years for most of the HDs; or that management challenges are only partially habitat related. That is, elk security is adequate in many HDs. The FP standard is not an accurate indicator of elk security." BHA Issue: Many of the FWP Hunting Districts included in the Travel Plan area are composed of substantial percentage of private lands closed to most public hunters. Although these private lands defacto serve as hunting security, it is inappropriate to construe that elk security is adequate on the Forest proper. The Forest, to meet its responsibility for land stewardship and public land hunting, (78-28) is responsible for providing adequate elk security within the boundaries of the Forest. The analysis of current elk security conditions do not convey that the current elk security definition is "outdated" as stated in the DEIS (Summary p 37), but simply that the Helena Forest has not managed the transportation network to provide enough elk security. Proposing to adopt a 20 year old untested Hillis Paradigm as the appropriate elk security science is unjustified and unprofessional. BHA Issue: In addition we challenge the facts concluding that all is well with elk in	(78-28)The Forest Plan amendment recognizes that private land poses management challenges for elk "[s]everal studies found that elk may find more complete security during hunting seasons by moving to private lands that restrict hunter access or prohibit hunting which limit is MFDWP ability to manage herd sizes through harvest" (as an example). (See the National Environmental Policy Act/Comparison of Alternatives/Discussion section). The amendment also includes a discussion of the management challenges faced within the respective hunting districts within which the Divide Travel plan occurs (See the section Factors Influencing Elk Management). Furthermore, the intent of Alternative B is to "reduce elk displacement from public land prior to normal migration events. This addresses a primary management goal for MFWP: maintaining or enhancing elk presence on National Forest System lands so that elk are available to the hunting public on public land". (See the National Environmental Policy Act/Comparison of Alternatives/Discussion section). (78-29)In response to public comments, the Forest Plan amendment incorporated additional data and discussion relative to bull/cow ratios and other metrics MFWP utilizes to measure bull survival post-harvest. See the sections Factors Influencing Elk Management and Cumulative Effects.

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the Divide. What is the actual bull/cow ratio in these hunting districts relative to FWP elk objectives, especially when only public land is considered? Are all Forest elk populations in the travel planning area above FWP objective? What proportion of the Divide Travel Plan area elk stay on the Forest throughout the hunting season or and what proportion get pushed to private lands closed to the general hunting public? What concurrence did the Forest receive from MDFWP that all elk herds in the Travel Plan Area meet elk objectives established by MDFWP?(78-29) DEIS Summary p 38. "In conclusion, Forest Plan big game standard #4a, inaccurately depicts the nature of elk security in the Divide landscape, is insensitive to changing road densities, and places unnecessary and impractical constraints on travel management. Meanwhile, the more recently developed elk security area methodology provides a reasonably accurate picture of elk security across the landscape, is responsive to proposed changes in open road patterns, and correctly directs management to areas that need further attention. BHA Issue: We dispute that hunting security "insensitive to changing road densities" and is less important because elk numbers are at or above objective n some hunting districts. Lyon (1963) long ago established the relationship of road density to elk habitat use. Our BHA hunters find elk moving to private lands even during the archery season as a result of dissected or fragmented habitats, hunting pressure and disturbance from excessive motorized access.(78-30) BHA Issue: The Forest has failed to document the "inaccuracy" of the nature of elk security as expressed in the current elk security standard. Why was this Standard the best available science when adopted (with supporting published papers) when the Forest Plan was developed but is now inaccurate? How is the Hillis Paradigm more accurate, given it was developed for heavily vegetated continuous canopy conditions and the authors caution about its applicability elsewhere? We strongly disagree with these conclusions. We also disagree that 4a places "unnecessary and impractical constrains on travel management" Given that the Helena has presented Alternative 3 as a viable alternative demonstrates the Helena could easily make	(78-30)The Forest Plan amendment provides the rationale as to why Standard 4a is insensitive to changing road densities. The analysis does not negate the relationship between road densities and elk distribution; rather it points out that despite the several miles of road closures, several herd units continue to be below Standard 4a regardless of changes in open road densities that would clearly benefit elk. See the Comparison of Alternatives/Alternative A/Discussion section. (78-31)Alternative B was developed for the FEIS to address these comments. Patch size was increased from 250 to 1000 acres to account for the more open terrain on 'eastside' forests. Hunting season was extended to include the archery season. Cover guidelines have been included. Alternative B is in keeping with the Hillis paradigm in that it "strict adherences to the guidelines" was avoided. Alternative B reflects collaborative discussions with MFWP biologists and other Forest Service personnel (See U.S. Forest Service and Montana Department of Fish, Wildlife, and Parks Collaborative Overview and Recommendations for Elk Habitat Management on the Custer, Gallatin, Helena, and Lewis and Clark National Forests). Furthermore, the analysis conducted for an alternative considered but not fully developed indicated that even if the Forest could close all roads over which it had jurisdiction, one herd unit would continue to remain out of compliance with Standard 4a. The other 2 herd units (currently below Forest Plan thresholds) that would come into compliance with Standard 4a would require most, if not all, of the roads in the respective herd unit to be closed from 9/1 to 12/1 precluding any other Forest uses during that time. See the Comparison of Alternatives/Alternative

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progress in meeting the 4a standard without being "unnecessary and impractical". There is no analysis nor concurrence by the Hillis Paradigm authors that this methodology is applicable to the Helena National Forest vegetative or topographic conditions. (78-31) There is no discussion of other elk security methodology in this DEIS that may be more applicable to Helena conditions. We have listed a few of the more recent elk security related papers which should have been analyzed and addressed as part of any elk security amendment process that are more current than the 20+ year old Hillis Paradigm. The evidence that substantial numbers of elk move onto private lands early in hunting seasons demonstrates that current elk security is inadequate in the Divide Travel Plan area. BHA Issue: The DEIS fails to acknowledge the importance of on-Forest elk and elk carcasses to TES listed grizzly bears, soon-to- be listed wolverine, other sensitive species and other large carnivores as well some birds of prey. Retaining large numbers of elk on the Forest during most of the year also provides retention of this important prey/food base for these species that otherwise follow the prey/food to private lands where potential conflicts with livestock and other private land uses are higher. Such important connection of elk to other species must be evaluated in the biological assessment for these listed species, and must weigh heavily on selection of a final alternative. We request an analysis of the connectedness between the retention of elk on the Forest and the benefits to the grizzly bears, wolverines, other large carnivores and some birds of prey. (78-32) 4f. Enforcement is a shared responsibility. Enforcement needs will be coordinated with the MDFWP. 4f The Helena suggests that travel planning meetings with FWP resulted in coordination discussions between both agencies. Implementation of the travel plan will be coordinated with FWP post decision and prior to and during implementation. BHA Issue: Enforcement of any travel plan has and will continue to be a major issue affecting both resources as well as non-motorized users. Past experience by	A/Discussion section. (78-32)The Wildlife Background Report discusses, in a number of places, the issue of off-Forest elk, both on winter range and on private land refuges during the hunting season (see p. 49-51, 57-58, 74). We feel that this is not a problem for large carnivores for a couple reasons. First, wolves, bears, wolverines and other predators/scavengers will readily follow big game animals into the kinds of off-Forest habitats that support them during the winter and hunting season. A large proportion of the sightings of these carnivores in this area have been in off-Forest areas. Secondly, the number of elk that remain on the Forest and that are killed by hunters and predators, or that die of natural causes, is more than sufficient to supply the relatively small number of large, wide-ranging carnivores in the Divide landscape with carrion (see, for example, Wildlife Background Report, p. 103-104). (78-33)Thank you for your input, This objective of this analysis is to identify the transportation system necessary for management of the Helena National Forest. Impact to resources is just one aspect of consideration. Off route travel violations are enforced by Forest Service law enforcement. Project design features and best management practices have been developed to minimize effects to resources from this use, as described in the EIS

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our members is large scale frustration with the lack of effective enforcement of current and past Helena Forest Travel Plans. Motorized closures are regularly breached understating the negative effects of motorized uses on natural resources and non-motorized Forest users. Violators are rarely prosecuted. We request the NEPA process document the historic and realistically expected non-compliance of this proposed travel plan and project the effects of expected non-compliance throughout the NEPA resource effects analysis. We request FEIS documentation of historical recorded travel plan related motorized violation complaints compared to convictions or bond forfeitures resulting from these complaints (78-33).	
BHA Issue: It is imperative to significantly reduce travel plan non-compliance. It is imperative that travel planning decisions assess and document enforceability of each road system treatment before deciding on the transportation network. Trailhead locations, intersections of non-motorized and motorized routes, vegetative cover type along motorized routes are some key analysis features that should be considered before a motorized network is developed. "Implementation of the travel plan will be coordinated with FWP post decision and prior to and during implementation" does not assure an enforceable transportation network. Waiting to engage enforcement expertise until after the travel plan decisions have been made makes enforcement more difficult if not impossible. We do not believe the intent of this standard is met if enforcement coordination does not take place prior to decisions. Therefore we request field level enforcement personnel of both FS and FWP be directly engaged and submit site specific recommended enforcement considerations well before a final decision has been made. According to our research, FWP enforcement agents have not been consulted to date on site specific proposal (78-34).	(78-34)Thank you for your input
BHA Issue: Loop trails are known to lead to considerably more motorized use with expected higher maintenance costs and resulting in greater conflict with resource objectives, higher maintenance costs in an era of declining maintenance budgets, and non-motorized users. If existing user created routes are considered for adoption as part of the loop, it is doubtful if these user created routes meet Forest trail	(78-35)The IDT analyzed the effects of each alternative utilizing the best available scientific information and by following laws, policies, and procedures that are in place. The Forest Service made every effort to measure potential site-specific impacts, but some impacts are difficult to quantify in all cases. Where necessary, impacts are described qualitatively and in the context of trends in order to provide an adequate comparison between the alternatives. The addition of previously unclassified roads to the Forest Service Transportation system was analyzed as part of the effects analysis in the Hydrology Specialist Report. This decision would allow for implementation of road maintenance and best management practices intended to minimize impacts to water quality on roads previously unclassified in the travel system. The negative effects associated with the addition of these routes

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standards for watershed protection nor riparian protection. Have each of these proposed routes been assessed whether they can be brought to FSH trail standard? How will resource protection, including INFISH standards, water quality laws including impaired watersheds be assured until these routes are brought up to these standards? Proper trails grades, drainage features, stream crossing structures and location are all requirements when constructing a new trail. We object to not having these features in place when adopting a user created route. Declining budgets will likely mean timely relocation or reconstruction to meet trail standards will not occur. Only the continued or increased use and adverse resource impacts will realistically occur. We object to adoption of user created routes until they are reconstructed or relocated to protect watershed or riparian values. Have trail condition surveys been completed on user created routes proposed for adoption, and if so, we request the trail specific display of anticipated work needed to bring them up to FSH trail standards?(78-35) 4h. The Forest Road Management Program will be developed in conjunction with MFWP and interested groups or individuals BHA Issue: "Developed in conjunction with MDFWP" requires all aspects of FWP responsibilities be engaged in all aspects of travel planning. This includes enforcement, wildlife, fisheries and would require concurrence with the elk security amendment on which this travel plan is dependent. We find that this "development in conjunction" has not occurred and therefore the process does not follow Forest Plan direction.	would be offset by the potential to decommission roads with resource issues in future projects.
Fisheries Standards 1. Maintain quality water and habitat for fish by coordinating Forest activities and by direct habitat improvement (see Forest Wide Standards for riparian) In Alternative 2 the DEIS p 204 alleges that fish habitat conditions would be maintained or improved by closing only 13% of high risk roads. However this alternative increases risk to fisheries by opening high risk roads in 3 sub watersheds. Furthermore, 5 sub-watersheds would have an increase in stream crossings of previously closed roads, thus putting their fisheries and downstream fisheries at risk.	(78-36)Thank you for your comment.

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BHA Issue: We object to concluding Alternative 2 meets Forest Plan direction when high risk roads are opened to motorized use. We also object to adopting user created routes without a site specific analysis of their potential adverse effect on fisheries habitat is irresponsible and in conflict with this standard. Also adopting routes that will require reconstruction, relocation or heavy maintenance with expectations of a lower facility budget is irresponsible and not in compliance with this standard. We simply do not believe it is reasonable that adopted trails will be reconstructed, relocated or have heavy maintenance given the expected budget. Each year that such trail work is not completed means fish habitat is damaged from bleeding sediment and unimproved stream crossings. Elsewhere in this document, the Forest states that available budgets will be prioritized on heavily used primary roads, acknowledging that backcountry and user created motorized trails will not receive necessary facility maintenance, reconstruction or relocation (78-36). The Forest Plan directs that instream activities should allow for maximum protection of spring and fall spawning habitats. BHA Issue: INFISH Standards provide direction for roads within 300 feet of bull trout and WST streams, however, such specific route segments within this 300 foot distance are not displayed, nor resolution of the direction specified. Also the sediment analysis must include all active channel crossing as delivery points, not just stream crossings (78-37). Watershed Guidance Standards 3. A project which causes excessive water pollution, undesirable water yield, soil erosion, or site deterioration will be corrected where feasible, or the project will be re-evaluated or terminated. BHA Issues: Adopting a user created motorized route is indeed a “project” because the adoption of a previously illegitimate route is then classified as a designated route	(78-37) The Affected Environment section of the Hydrology Specialist Report reports the total number of sediment sources observed for each alternative. These sediment sources include all active channel crossings, as well as potential sediment delivery locations observed on hydraulically connected road segments adjacent to streams. The Hydrology Specialist Report now analyzes the miles of road within the riparian habitat conservation areas (RHCAs) specified by INFISH standards. (78-38)The addition of the roads to the Forest System was analyzed as part of the effects analysis in the Hydrology Resource Report and is discussed in the Environmental Consequences section. The user-created routes were evaluated by determining the number of stream crossings and the mileage within riparian habitat conservation areas that would be added to the transportation system. The effects to water quality associated with the adoption of unauthorized routes are minimal for each action alternative and are offset by the potential of future road decommissioning afforded by this decision.

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facility with assumptions about future maintenance which will have potential adverse impacts, depending on soils, location, and design for the facility. To meet this standard, any user created route proposed for inclusion in the transportation network requires an on-site analysis, including a site condition survey on potential fisheries habitat effects before being adopted. We find that proposed adoption of user created trails without site specific analysis as to how these routes meet resource concerns are met in violation of Executive Order 11644, which states "Sec. 9. Special Protection of the Public Lands. (a) Notwithstanding the provisions of Section 3 of this Order, the respective agency head shall, whenever he determines that the use of off-road vehicles will cause or is causing considerable adverse effects on the soil, vegetation, wildlife, wildlife habitat or cultural or historic resources of particular areas or trails of the public lands, immediately close such areas or trails to the type of off-road vehicle causing such effects, until such time as he determines that such adverse effects have been eliminated and that measures have been implemented to prevent future recurrence (78-38). BHA Issue: We object to adoption of user created of routes because they have disproportionately greater conflict with resource objectives, higher maintenance costs in an era of declining maintenance budgets, and conflicts with non-motorized users. If existing user created routes are considered for adoption, it is doubtful these user created routes meet Forest trail standards for watershed protection nor riparian protection. Trails grades, drainage features, stream crossing structures and location are all considerations when constructing a new trail (FS Trail handbook), but are not features considered or incorporated when adopting a user created route. Declining budgets will likely mean suggested relocation or reconstruction to meet trail standards will not occur. Only the use and associated resource impacts from that continued use will realistically occur. To comply with EO 11644 we object to adoption of user created routes until they are reconstructed or relocated to protect watershed or riparian values, and meet trail or road design standards as well as water quality standards... (78-39)	(78-39) Thank you for your input, Divide Travel Plan analysis is an open or closed decision process.
Soils Guidance Standards	(78-40) The Divide Travel Plan will only determine open and

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1. In accordance with NFMA, RPA, and Multiple Use Sustained Yield Act, all management activities will be planned to sustain site productivity. During project analysis, ground disturbing activities will be reviewed and needed mitigating actions prescribed. BHA Issue: Adoption of a user created route is defacto "construction" as it is added as-is to the transportation network. This standard says that needed mitigation actions will be prescribed. Those needs can only be identified if site specific analysis of each route leg has a soil related onsite visit prior to adoption. Routes adopted in sensitive soils, steep lands or located vertically on a slope are almost impossible to mitigate soils, and only at great expense. According to the Forest, those needed funds are not adequate and not projected to increase. We find it irresponsible and in violation of this Standard to adopt user created routes without a detailed analysis of how feasible resource mitigation may be. (78-40)	closed routes only. Future NEPA will determine how the Travel Plan will be implemented and what mitigation measure(s) will be put in place.
2. Areas of decomposed granite soils will be identified and erosion control measures planned prior to any ground disturbing activities. BHA Issue: Continued motorized use on motorized routes is a ground disturbing activity, and therefore subject to the requirement to identify these route segments and plan erosion control measures before these routes are included in the open motorized route network. The DEIS response above indicates the Forest has not given special attention to route selection based on sensitive soils. We believe at least one alternative should analyze closing most non-essential routes in sensitive soils to motorized use to meet Forest Plan direction, including this Standard. (78-41)	(78-41) The Divide Travel Plan will only determine open and closed routes only. Future NEPA will determine how the Travel Plan will be implemented and what mitigation measure(s) will be put in place.
3. To reduce sedimentation associated with management activities, the highly sensitive granitic soils, which cover about 20 percent of the Forest, will have first priority for soil erosion control. BHA Issue: We fail to see how "self-maintaining" a closed motorized route meets	(78-42) The Divide Travel Plan will determine open & close status. Future site specific analysis will determine closure

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this standard, especially in granitics. Granitics are extremely erosive and rather extensive methods are applied to insure erosion is minimized even on closed roads. Any closed road in granitics cannot be simply closed in its current condition and assumed to not continue to bleed sediment nor accelerate erosion on disturbed areas. To meet this standard any closed route in granitics requires state-of-the-art erosion control measures be highly prioritized during implementation. (78-42)	method.
Forestwide Road Standards 1. Road construction and reconstruction will be the minimum density, cost, and standard necessary for the intended need, user safety, and resource protection.	(78-43) See Alternative 5.
BHA Issue: The Divide travel plan proposes to adopt or maintain open travel routes far in excess of realistic budget projections to maintain or reconstruct. It is realistic to assume that with declining budgets that any reconstruction will be minimal and road maintenance will decline. As a result the Forest must project that compliance with the Streamside Management Zone law, Water Quality Best Management Practices for Montana Forests, USDA National Best Management Practices for Water Quality Management on National Forest Land will not be met with the planned transportation network. To meet these laws, no additions to the transportation system can be adopted; the final decision must reduce the transportation network to the quantity that provides for proper reconstruction and maintenance. (78-43)	
Forestwide Road Management Standards 1. The Helena National Forest will generally be open to vehicles except for roads, trails, or areas that may be restricted. (See Forest Visitor Map for specific information.) The Forest Road Management Program will be used to review, evaluate, and implement the goals and standards of the management areas in the Forest Plan with regard to road, trail, and area wide motorized vehicle use.	(78-44)Tristate Off-Highway Vehicle Decision was the direction given until a site specific analysis could be completed. Divide Travel analysis is that site specific analysis that replaces the interim direction.

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This standard was amended based on the 2001 Tri-State Off-Highway Vehicle Decision (see Summary of Forest Plan Amendment20 at the beginning of appendix A. BHA Issue: "In all alternatives, access to the Helena National Forest will generally be open to vehicles except for roads and trails that may be restricted as defined in the road and trail management objective." This statement does not reflect the Tristate Off-Highway Vehicle Decision that motorized use will be restricted to roads and trails and motorized travel off designated routes will not be permitted. The Helena Standard (before amendment) does not meet National direction. Amendment 20 direction is ignored when the statement is made that the Helena "Forest will be generally be open to vehicles".(78-44)	
4. Enforcement of the Road Management Program will be a high priority. Weekend patrolling, signing, gating, obliterating unnecessary roads and public education will be used to improve enforcement. Enforcement will be coordinated with the MDFWP and other State and local agencies.	(78-45)Out the Scope of the analysis
BHA Issue: The effectiveness of enforcement of travel plan restrictions has and will continue to be a major issue affecting both resources as well as non-motorized users. Past experience by our members is large scale frustration with the lack of effective enforcement of current and past restrictions in the Divide Travel Plan area. Closures are regularly breached understating the negative effects on natural resources and non-motorized Forest users. Violators are rarely prosecuted. We request the NEPA process document the realistically expected non-compliance of this travel plan and calculate this expected non-compliance throughout the NEPA resource effects analysis.(78-45)	(78-46) Thank you for your input
BHA Issue: A Travel planning decision process must incorporate enforceability before deciding on the transportation network. Trailhead locations, intersections of non-motorized and motorized routes, vegetative cover type along motorized routes are some key analysis features that should be considered before a motorized network	

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is developed. Waiting to engage enforcement expertise until after the travel plan decisions have been made makes enforcement more difficult if not impossible. We request enforcement of both FS and FWP be directly engaged and submit recommended enforcement considerations well before a final decision has been made.(78-46) Forestwide Road Maintenance Standards 1. Roads will be maintained in accordance with direction provided in FSH 7709.15 (Transportation System Maintenance Handbook) and will be at a level commensurate with the need for the following operational objectives: resource protection, road investment protection, user safety, user comfort, and travel efficiency. BHA Issue: This standard does not say this standard will be met only on higher use roads or where resource damage has been identified. Simply, with inadequate maintenance budget, the road network must shrink to a level commensurate with the maintenance budget.(78-47) Forestwide Trail Standards 1. Trail management, such as trail standards, maintenance schedules, funding, trail use, construction, and reconstruction, will follow the guidance in Trails Management Handbook, FSH 2309.18. BHA Issue: "Maintenance dollars are dispersed annually and are generally directed to higher use roads and to specific areas where there is a need identified to prevent resource damage. The funding we receive is never adequate to cover the cost of maintenance to maintain roads to a suitable standard. We do not anticipate an increase in funding and in fact anticipate a decrease in maintenance funding."(DEIS) We fail to see how the Helena can meet this standard under Alternative 2 when the above Helena quote describes the bleak funding outlook. To meet this standard, the	(78-47) Refer to Transportation report.

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amount of motorized trail routes needs to be substantially reduced in this travel plan. Alternative 3 moves the Divide Travel Plan area in a responsible direction regarding this standard. The Forest is ignoring this standard when it proposes to adopt user created trails it well acknowledges it will not be able to FSH 2309.18 direction. Why was an alternative not developed that included a minimum road and motorized trail budget that was commensurate with anticipated maintenance budget? 3. Trail construction/reconstruction will be designed and accomplished to be compatible with the recreation settings and management area goals. BHA Issue: "Maintenance dollars are dispersed annually and are generally directed to higher use roads and to specific areas where there is a need identified to prevent resource damage. The funding we receive is never adequate to cover the cost of maintenance to maintain roads to a suitable standard. We do not anticipate an increase in funding and in fact anticipate a decrease in maintenance funding." We fail to see how the Helena can meet FS trail standards when the above Helena quote describes the funding outlook. To address the insufficient budget, the amount of motorized trail routes needs to be substantially reduced to a level where the FS Trail standards can be met. To do otherwise is not meeting user safety nor resource protection needs.(78-48)	(78-48) Right sizing the transportation system by converting roads to trails will aid in the reduction of maintenance costs. HNF has a very robust partnership/collaboration program that has brought in thousands of dollars for trail maintenance, weed spraying and enforcement...
Recreation Management RM1. Design, construct, and operate recreation facilities, including trails and dispersed sites, in a manner that does not retard or prevent attainment of the Riparian Management Objectives and avoids adverse effects on inland native fish. Complete watershed analysis prior to construction of now recreation facilities in Riparian Habitat Conservation Areas within priority watersheds. For existing recreation facilities inside Riparian Habitat Conservation Areas, assure that the facilities or use of the facilities would not prevent attainment of Riparian Management Objectives or adversely affect inland native fish. Relocate or close recreation facilities where Riparian Management Objectives cannot be met or	(78-49)Riparian concerns will be addressed during implementation of the travel plan. Trail maintenance or reconstruction will address site specific resource concerns.

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adverse effects on inland native fish cannot be avoided. BHA Issue: The DEIS fails to adequately address how the proposed travel plan insures trails located in or adjacent to riparian areas are meeting the Riparian Management Objectives or Recreation Management Standard 1. Without Forest Service site specific analysis and data including a trail condition survey, we cannot address individual routes. However, prior to adoption of a trail network, this Standard requires before completion of this travel plan that the Forest Service complete a site specific analysis of existing trail routes, as well as proposed adoption of user created routes as it pertains to meeting Riparian Management Objectives. The presence of a trail in the riparian area is subject to erosion, trail widening, wet conditions, compaction, displacement of wildlife from a key habitat and subjects the fish population to heavier fishing pressure. In some cases these streams could support bull trout or westslope cutthroat, including spawning activity, for which a 300 foot RHCA would apply. A motorized trail encourages dispersed camping, most commonly in a Riparian Habitat Conservation Area, and therefore is subject to site specific designation or other enforceable controls to meet Riparian Management objectives. (78-49)	(78-50) Alternative 5 addresses the Parking and Access to dispersed camping issue by limiting camping within 70 feet from a designated route
BHA Issue: The proposal to allow off route travel of up to 300 feet from a motorized route for camping invites and appears to legitimize threats to the Riparian Management Objectives. How does the Helena propose to assure that future or existing campsites don't threaten RMOS?(78-50)	(78-51) Thank you for your input.
Appendix C Road and Trail detail by Alternative It is required that all motorized routes in Inventoried Roadless Areas be analyzed for their impacts on each special roadless area attributes as proposed in each Alternative. It is required by the Travel Planning Rule and Executive Orders that impact of travel plans on Roadless Areas be described by Alternative, including the number of miles of motorized routes by type by Alternative.	

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BHA Issue: Continental Divide National Scenic Trail. CDNST National Management direction discourages motorized use with some exceptions. One constraint on that direction is that such type of motorized use must have occurred prior to trail designation which occurred in 1978. Therefore, unless the Forest can demonstrate that the trail had the same type of motorized use in 1978, it cannot be allowed now. 1978 is prior to ATVs so only motorcycles could be considered to meet this direction and only if they do not impair the purpose of the Trail. The CDNST trail for the most part is along ridgetops which is the most adverse location to elk security as it allows motorized hunters to access the drainage heads which are preferred habitat for elk. Motorized use along this trail system disproportionately displaces elk from drainage heads as their preferred summer habitats. Therefore the only treatment of the Trail as proposed in Alternative 3 is appropriate. However, eliminating all motorized use should be considered as best meeting CDNST direction.(78-51) DEIS Appendix D Cumulative Effects DEIS Appendix D- Proposed Elk Security Amendment The Helena has some quality backcountry such as the Scapegoat and parts of the Elkhorn mountains. However, most of the few remaining secure, undeveloped parts of the Helena within the Divide Travel Plan area are unroaded simply because they are overly steep, rocky and otherwise unproductive for both timber and elk. Studies of elk habitat selection document that elk, like people, select for gentler terrain and spend little time on terrain over 30% slopes. However, much of the lower, gentler, and often most productive elk habitats of the Helena have been roaded; have been laced by ORV routes, or both. In the last 25 years the problem has been exacerbated by a proliferation of off road vehicle routes, both authorized and unauthorized renegade routes. In addition the frequent and extensive violations of existing motorized restrictions render much of the Helena's most productive elk habitats seriously compromised, particularly when need to serve as secure habitats during the hunting seasons.	

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The Helena's elk security habitat condition now is largely dissected and often marginally or insufficiently small during both the archery and general hunting seasons. This deteriorated security condition has adverse impacts on elk security now and likely will have even worse effects in the future. Hunters on the Helena are already experiencing major displacement of elk from public lands onto private lands, where general hunter access is most often denied. This is a problem not unique to the Helena, as it is already a documented phenomenon on the Beaverhead-Deerlodge, the Gallatin and the Lewis and Clark Forests. An example of the behavioral response of elk to human disturbance was well documented in Montana by Grigg (2007), who documented elk moving from the roaded Taylor Fork to the private Sun Ranch early in the archery season. Similar movements have been documented elsewhere, including the Bitterroot National Forest. Movements early in the archery season are also occurring within this travel plan analysis area. In addition, mature bulls, a favorite hunter pursuit, are increasingly a smaller percentage of the herd due to lack of security on public lands. A mature bull component is important to breeding and breeding timing that results in calves mature enough to survive their first winter. Without protecting and enhancing hunting security, the existing 5 week general season will trend toward more permits-only hunting or shortened seasons, or both. The Elkhorns area, for example, has mature bulls, but also a very limited number of permits. BHA Issue: Control of herd numbers can only occur with hunting if cow elk remain on public lands throughout the hunting season to facilitate adequate harvest. Displacement of cow elk to private lands during the hunting season is already occurring and seriously reduces effective population control capability by MDFWP. This situation of elk displacement from the Forest to private lands explains much of why some elk herd units are above objective, rather than the conclusion by the Forest that present security is adequate. The response by responsible land managers to these elk related issues must be to enhance, rather than lessen the quantity and quality of secure elk habitat, especially in the Divide Travel Plan area. We believe that Helena land managers have ample opportunity as well as the obligation to	(78-52)Forest Plan amendment Alternative B (FEIS) was developed in response to these and other comments to provide a framework to retain elk on public land. The analysis for Alternative B (See Comparison of Alternatives/Alternative B/Discussion) identifies elk use of private land as an issue and cites studies that indicate elk migration patterns can be influenced through road closures. (78-53)Alternative B was developed in response to comments regarding effects of the archery season on elk security. Security in Alternative B is now defined as "a proportion of an elk herd unit within the administrative boundary of the Helena Ranger District that consists of an area of at least 1000 acres in size that is at least ½ mile from a motorized route open to the public between 9/1 and 12/1. Security blocks are adjusted for constrictions less than or equal to ½ mile in width" (See Alternative Description/Alternative B section). Allen (literature capture) (78-54)Alternative B is not a blanket application of the Hillis Paradigm. Rather it adopts work reflected in the U.S. Forest Service and Montana Department of Fish, Wildlife, and Parks

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restore large scale elk security areas (78-52). BHA Issue: The importance of elk security during archery seasons cannot be understated. Often public land elk have been displaced to private lands by archery hunting activities even before general elk seasons have begun as documented on the MDFWP studies on the Gallatin National Forest (Grigg, 2007). Furthermore, Forest Service studies of elk in the Blue Mountains of Oregon (Wisdom, et al, 2005) have documented by telemetry under carefully controlled conditions that elk are displaced as far as .93 miles by the presence of motorized vehicles. Simply, all road closures related to wildlife habitat must commence no later than September 1.(78-53)	Collaborative Overview and Recommendations for Elk Habitat Management on the Custer, Gallatin, Helena, and Lewis and Clark National Forests (i.e. consider effects of archery season on elk security, MFWP and FS biologists jointly developing specific recommendations, increasing patch size). Alternative B includes recognition of the differences between Westside forests where the Hillis Paradigm was crafted and eastside forests. See the Comparison of Alternatives/Alternative B/Discussion section.
BHA Issue: The Helena has inappropriately chosen to focus on the Hillis Paradigm as guidance to managing elk security on the Forest in the future, under a proposed Forest Plan Elk Security Amendment. However, the values used and its application to the Helena is un-validated and lacks scientific scrutiny. This concept lacks any scientific validation as to the adequacy of the patch size (250 acres) or the distance from motorized routes (1/2 mile). The Hillis Paradigm, never validated, was developed for Westside Forest conditions, primarily the Lolo. The Lolo's elk habitats are for the most part, much more continuous canopy, and thicker, multistoried canopies often with a dense, high underbrush understory of such shrubs as alder, mountain maple, and ninebark. By contrast, the Helena forests are generally discontinuous, are dominated by single story, open, dry forests with very low understories. The Lolo's terrain is also generally much steeper and dissected. We conclude it is inappropriate use of elk vulnerability science to adopt the Hillis Paradigm without specific validation for the Helena.(78-54)	(78-55)Alternative B does not deviate from the ½ buffer used to define security areas. However, it does includes a buffer around private land inholdings of ½ mile (not included in the Hillis paradigm) to account for activities on private land that could affect elk security on the surrounding National Forest System lands (See security definition in Alternative Descriptions/Alternative B). Patch size has also been increased in recognition that smaller patch sizes on eastside forests could facilitate hunter access into secure areas. Forest Plan monitoring items remain in place to measure the efficacy of the new standard (See Monitoring section).
The ½ mile-250 acre patch criteria discounts the reality that significant numbers of elk hunters do indeed walk more than ½ mile from a road (a 10 minute walk on easy terrain) and would displace from a 250 acre patch (about 1/3 square mile) in less than an hour. We believe if you tell a serious elk hunter there is a 250 acre patch of unbroken timber habitat only ½ mile from a road, many, if not most, would	(78-56)Alternative B includes an analysis of hiding cover in security areas (See table 'Acres of hiding cover in security and

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willingly walk to such "secure" elk habitat. Blanket application of the Hillis Paradigm also fails to consider the presence of old roadbeds, trails or gentle terrain common to the Helena which facilitates easier and quicker travel to a cover patch. In summary, we conclude the Hillis Paradigm is overly simplistic, un-validated and inappropriate for the Helena to use as a big game vulnerability standard. BHA Issue: Wisdom (2007) found elk avoiding the presence of off road vehicles up to nearly a mile away.(78-55) What validation has occurred to demonstrate that most elk remain in Divide Travel Plan area cover patches only ½ mile away (Hillis Paradigm) from the presence of motor vehicles during the hunting season? What has the Helena done to demonstrate the quality of elk security given the terrain features present or lack thereof, vertical relationship of open roads to the cover patch, ease of access by hunters due to open vegetation or old road prisms, or the density of the cover patch? BHA Issue: The Forest has acknowledged the Forest is thinning due to insects, disease, and other factors. The forest canopy is also discontinuous with many natural non-forested openings. In addition some poor regeneration in previously harvested and thinned forest stands has further reduced large patches of heavy multistoried cover. Christensen et al (1993) indicate that cover analysis is justified when "Today, detailed analyses of hiding and thermal habitat components are not considered as essential except in habitats with high natural levels of openings or where conifer cover is at a premium". Given that the Divide Travel Plan area fits this description of "high natural levels of openings or where conifer cover is at a premium" we request a thorough analysis of hiding and thermal cover as it relates to elk hiding cover. We would expect that any patch attributable to elk security during hunting season to be examined as to its cover composition. What criteria is used in describing elk cover and how was it analyzed and applied to each potential cover patch?(78-56) BHA Issue: Forests are cautioned by elk biologists to use site specific knowledge with state agency personnel in using models such as the Hillis Paradigm. Christensen, et al (1993) urges "In discussions with biologists in Idaho and	intermittent refuge areas by Alternative'). That analysis indicates that hiding cover percentages are greater than 80% in all security areas combined for all Travel Plan alternatives. The figure 'Distribution of Forest Plan Hiding Cover in the Divide Travel Plan area' illustrates this. The section Potential Elk Security describes potential cover which includes existing hiding cover and areas capable of providing hiding cover that currently do not. That analysis indicates that most of the security areas have realized their potential for providing hiding cover through the availability of existing cover (See table 'Acres of existing and potential hiding cover in security areas for Alternatives 1 and 5'). The section 'Hiding Cover Methodology' describes how hiding cover is identified, measured, and mapped in the project area. (78-57)Alternative B was developed with MFWP area biologists who rely on their knowledge (including aerial survey data) to identify security issues in the Divide Travel Plan area. Allen (literature capture) (78-58)The Forest Plan amendment includes a discussion of the relationship of hunter access, elk security, and elk mortality. "Basile and Lonner (1979) reported that when vehicular travel was restricted, hunters spent more time walking, saw more elk, and had greater success which may have been a function of elk staying in the area longer and in greater numbers due to the travel restrictions. Unsworth and Kuck (1991) noted that road closures may have varied effects on animal distribution and hunter use

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Montana, there appears to be a gradient from west to east regarding the significance of cover in this equation. In northern Idaho, it appears that open road density, hunter numbers, and topographic roughness are the major considerations (Unsworth and others 1993). Cover is so ubiquitous that security can be controlled with road management alone. As you move east into Montana and over the Continental Divide, cover considerations become more important because cover is less abundant and less contiguous. It is extremely important for forest biologists to work with their State counterparts in developing criteria for security areas, including their size, extent, distance from roads, and vegetative characteristics. Data from radio telemetry studies are the best source for developing such criteria". Therefore we request the Helena provide the radio telemetry data or other validation of the Hillis Paradigm for use in the Divide Travel Plan area.(78-57)	and success. They cite to several studies where road closures allowed elk to remain in more preferred sites for longer periods of time which in turn affected elk mortality by providing easier access to hunters (Irwin and Peek 1979). This may be because elk and hunters were more likely to be in the same places – i.e. areas of low open road densities (Millspaugh et al. 2000)." See the section Alternative Description/Alternative B/Discussion.
BHA Issue: Most experienced elk hunters know where the remaining elk security is within the Divide Travel Plan area. Any patch of timber less than a mile from a road or ATV trail will have hunters in that habitat nearly every day during the season. It is our estimate that a solo hunter can hunt thru a 250 acre patch of cover (1/3 square mile) in less than an hour and likely move most or all elk from this cover patch, especially when other cover is not contiguous to the 250 acre patch. How many times and at what frequency is an elk herd disturbed before it seeks private land? Based on the eastside forest Grigg study, this threshold occurred in the Taylor Fork during the archery season and before general season even began. As the Forest chooses to manage elk security at minimum threshold levels, elk increasingly are crowded into these remaining "secure" areas, which concentrate hunting pressure into these areas as well. What is the effect of crowding both elk and hunters into the same "secure" areas? In addition, what is the hunting experience for those hunters who value or seek solitude, and do not seek to compete for getting to these secure areas before other hunters? What validation has the Helena done to demonstrate that elk stay within a 250 acre isolated patch when hunters seek elk in the same patch?(78-58)	(78-59)The Forest Plan amendment includes an analysis of elk security if all Forest Roads were closed. That analysis indicates shows that the largest patch size in that scenario would be approximately 38,000 acres. The smallest is ~1000 acres and the majority are less than 10,000 acres. In other words, the Forest does not have sufficient jurisdiction to close enough roads to create security patches that are between 25,000 and 50,000 acres in the Divide landscape. See the table 'Elk Security During the Hunting Season (9/1 – 12/1) Assuming All Forest Roads are Closed'. Additional data are in the project record.
BHA Issue: A valuable measure of successful elk security on the Helena is whether	(78-60) This is outside the scope of the Divide Travel Plan.

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the majority of elk stay on the Forest thru the general hunting season, or until driven to private land due to snow depth on the Forest. Simply, there are far too many motorized routes open on Helena, with little attention to insuring there are sufficient numbers of large blocks of secure elk habitat on productive lands within the Helena. The open nature of the Helena National Forest strongly suggests that the Forest should manage for non-motorized landscapes, rather than patches of cover at minimum distances from open roads to be successful in retaining elk on the Forest throughout the hunting season... BHA Issue: Given the natural openings, declining density of many forest patches, Backcountry Hunters and Anglers advocates the Helena establish 25,000-50,000 acre blocks of good elk habitat free of motorized routes during both the archery and general hunting seasons. This size of motor-free block of secure habitat is necessary to assure the center of such a block is at least 3 miles from the nearest open road. We advocate that all Roadless Areas be non-motorized, and can serve as core areas for which these larger security areas can be assimilated by closing and in many cases decommissioning roads and motorized routes.(78-59) BHA Issue: We believe the coordination of road management in this Travel Plan must extend beyond the immediate Travel Plan area. For example and open, surfaced road approaches the Bison creek area from the south via the Deerlodge NF, which dissects an otherwise large security block including the Little Blackfoot. Hunters are able to access the ridge separating Bison Creek headwaters and the Little Blackfoot drainage easily this way. (78-60) Also the Kading Ridge is key to how elk can use the Spotted Dog WMA. Closing all motorized routes along the Kading ridge complex during hunting season and restricting snowmobile use would allow elk to move freely toward Spotted Dog WMA without unnecessary risk of displacement to other late fall habitats on private lands. Montana Backcountry Hunters and Anglers urge the Forest to improve this Travel	

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Plan and Amendment process by resolving issues we have raised in this comment letter. Sincerely, s/greg munther Greg Munther, Co-chairman Montana Backcountry Hunters and Anglers	
(79) From: Dan Harper <dharper300@hotmail.com> Sent: Thursday, June 05, 2014 11:31 AM To: FS-comments-northern-helena Subject: Divide Travel Plan My children are 4th generation Montanans with a long history of enjoying quiet hikes and trail rides in Western and Central Montana. We do appreciate the effort that Ranger DeGeest has proposed to manage Sweeney Creek as a non-motorized area. There are some very important lands that need non-motorized protection to help provide a very important corridor connecting vital wild lands for wildlife. These same areas will also need protection for the quiet hiking and horse use that is so important to my family. I endorse protecting the Nevada Mountain wild lands with Alternative #3. In addition the Little Blackfoot road less land along the CDT corridor begs for non-motorized protection. This together with year around non-motorized protection extended along the CDT corridor to Mullen Pass will provide a marked benefit for wild life and provide a special place for nourishing the quiet trail values of hikers, hunters, and equestrians. Thank you for your consideration.	(79-1) Thank you for your comment.

Comments	Response to Comments
Daniel A. Harper, MD 3000 Marshall Canyon Rd. Missoula, MT 59804 406-258-6467	
(80) From: ROGER TAMMY <rogertulberg_58@msn.com> Sent: Thursday, June 05, 2014 9:43 PM To: FS-comments-northern-helena Subject: DIVIDE TRAVEL PLAN!! To Whom It May Concern: I would like to comment on the Divide Travel Plan. I know you will be getting a lot of non-motorized comments and I am on the other side of the issue. There are thousands of miles of hiking trails in our wilderness areas. Montana is way behind most other states when it comes to developed OHV trails!! I represent a group of 50 avid ATV riders whose average age is about 70. They are beyond the age of hiking and like to experience the woods with an ATV being the only way they can. We see more and more trails closed all the time and I am promoting extended development for motorized use. There is room for hiking and ATV usage but the Wilderness people just want all the motorized access closed which is not right and not what the majority of Montana folks really want to see happen. They are a vocal minority with more than enough hiking trails already.	(80-1) Thank you for your input

Comments	Response to Comments
My vote is for motorized access on the Divide Travel Plan. Roger Tulberg 1795 Arlington Dr. Missoula, MT 59801	
(81) From: Tim Horan <whome@bresnan.net> Sent: Saturday, June 07, 2014 2:06 PM To: FS-comments-northern-helena Subject: CDT corridor protections Dear Helena District Ranger Heather DeGeest: I urge you to fully protect the CDT and surrounding wild lands by adopting Alternative #3 and the Continental Divide Trail corridor protections. I ask that you please extend year round motor-free management of the headwaters of the Little Blackfoot to the roadless lands along the CDNST from Bison Creek to Upper Ontario Creek. Thank you for rehabilitating vehicle damaged Sweeny Creek as a proposed non-motorized area. I ask for an extension of this quite area to the Continental Divide National Scenic Trail(81-1). Again, thank you. Sincerely, Tim Horan	(81-1)Refer to Alternative 5.
(82) From: Porter Storey MD <porterstorey@palliativemd.com> Sent: Saturday, June 07, 2014 10:42 AM To: FS-comments-northern-helena	(82-1)Thank you for your comment. Refer to Alternative 5.

Comments	Response to Comments
Subject: Divide travel plan Dear District Ranger Heather DeGeest, Welcome to your new post and thank you for rehabilitating vehicle damage in Sweeney Creek as a proposed non-motorized area. I am very hopeful that you will extend this quiet area to the Continental Divide Trail corridors. As a prospective thru-hiker and father of a hiker I urge you to fully protect the Continental Divide Trail and surrounding wildlands by adopting Alternative #3. It is so important to the wilderness experience and the preservation of this national treasure, to extend non-motorized, year-round protection to these corridors. Of special concern are: MacDonald-Priest Pass, Priest to Mullan Pass, All Little Blackfoot Roadless Lands, Nevada Mountain wildlands along the CDT. Since alternative #3 is the only alternative based on a collaborative winter agreement endorsed by the Montana Snowmobile Association, Montana Fish Wildlife and Parks and the Montana Wilderness Association, it makes the most sense for all users (82-1). Thank you again, Porter Storey MD 5290 Euclid Ave, Boulder, CO 80303.	
(83) From: bruce@bcatter.com	

Comments	Response to Comments
Sent: Sunday, June 08, 2014 7:30 PM To: FS-comments-northern-helena Subject: Divide Travel Plan Heather DeGeest Helena District Ranger Helena National Forest Attn: Divide Travel Plan 880 Skyway Drive Helena, MT 59602 Hi Heather - Thank you for your support in rehabilitating vehicle damage in Sweeney Creek as a proposed non-motorized area. Please consider extending this quiet area to the Continental Divide Trail and fully protect the CDT and surrounding wildlands by adopting Alternative 3 and CDT corridors by: Protecting Nevada Mountain wildlands along the CDT by adopting Alternative 3, which is the only alternative based on a collaborative winter agreement endorsed by the Montana Snowmobile Association, Montana Fish Wildlife and Parks and the Montana Wilderness Association in 2005. Protecting the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round area protection to all Little Blackfoot Roadless Lands. Expanding year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass (83-1). Thank you for your consideration. Bruce Catter W10984 Lake Point Drive Lodi, WI 53555	(83-1)Refer to Alternative 5.

Comments	Response to Comments
bruce@bcatter.com 608.287.8919	
(84) From: Peggy Stringer <strpmls@gmail.com> Sent: Sunday, June 08, 2014 10:19 AM To: FS-comments-northern-helena Subject: Divide trail plans Protect Nevada mountain wildlands along the Continental Divide National Scenic Trail. Nevada mountain is the largest wild area in Helena for Ranger District. Keeping the Nevada Mountain wild year round by adopting alternative number 3 the only alternative which honors and implements the Lincoln north divide winner agreement endorsed by the Montana snowmobile Association and Montana Fish Wildlife and Parks and the Montana wilderness Association. Protect all little black foot roadless lands. Extend you're around motor free management of the headwaters of a little black foot to the road less land along the Continental Divide Trail from bison Craig to the upper Ontario Creek. Only 20 miles out of 75 miles along the Continental Divide Trail will be non-motorized protect the Continental Divide Trail and surrounding areas by designating these areas and trails as year round non-motorized: McDonalds pastor preach pastor preached amalan pass greenhorn mountain to Meijer Hill Nevada mountain.(84-1) Please rehabilitate vehicle damaged Sweeney Creek as a proposed non-motorized area. I Sincerely, Peggy Stringer 9 limestone court Helena Montana 59601 443 6628	(84-1) Refer to Alternative 5.
(85) From: Barbara Belt <barbsmontana@yahoo.com>	(85-1)Thank you for your comment.

Comments	Response to Comments
Sent: Monday, June 09, 2014 8:51 PM To: FS-comments-northern-helena Subject: Divide travel pan I'm from a group of friends and family who are avid hikers. We have a priceless trail in our state, part of a greater whole called the Continental Divide Trail. It isn't just a few feet of trail that needs to be protected but the surrounding lands that support the wildlife and wild experience. Please adopt the Alternative #3 which is about non-motorized use (85-1). The integrity of the land itself and of the animals who live there don't need to be subjected to the torn up meadows and noise that motorized transportation bring. Thanks. Barbara Belt (Po Box 237, Helena, MT 59624)	
(86) From: Bill Bucher <bbucher@mt.net> Sent: Monday, June 09, 2014 8:41 PM To: FS-comments-northern-helena Subject: Divide Travel Plan Ms Heather DeGeest Helena District Ranger Helena National Forest I am commenting on the Helena Forest's Divide Travel Plan. I would like to see the lands along the CDT from Bison Creek to Upper Ontario Creek remain roadless, reduced motorized use in the Nevada Mountain area in accord with the 2005 Lincoln-North Divide winter agreement, and see the CDT protected from MacDonald Pass to Greenhorn Mountain. I would also like to see the Sweeney Creek area, formerly one of my favorite off-season walking areas near Helena, restored to non-motorized use. I support Alternative 3(86-1). Sincerely,	(86-1) Refer to Alternative 5.

Comments	Response to Comments
Bill Bucher 301 Ming Place, Helena, MT 59601	
(87) June 6, 2014 Transcribed from Hand written Letter Letter Received 06/09/2014 Dear Sir or Madam, At this point you are probably getting sick of receiving letters from me, which you have been hopefully reading. I am just trying to make it clear to you all the significance of Montana wild lands. I write this on behalf of the millions of wilderness lovers across our nation and the world, all of the interconnected species that call these places home, and on behalf of the mission and visions of the likes of Bob Marshall and Aldo Leopold. What few places we have that remain somewhat wild are the most valuable resource we have in this world. It is critical that we preserve what remains wild. I ask you to support the designation of the proposed Electric Peak Wilderness and Nevada Mountain Wilderness. Thank you, Zachary Cardosi (815)549-3139 zmcardosi@gmail.com	(87-1) Thank you for your comment.
(88) From: carl.deitchman@gmail.com on behalf of Carl Deitchman <carl@deitchman.com> Sent: Monday, June 09, 2014 8:56 AM To: FS-comments-northern-helena Subject: Divide Travel Plan	(88-1) Refer to Alternative 5.

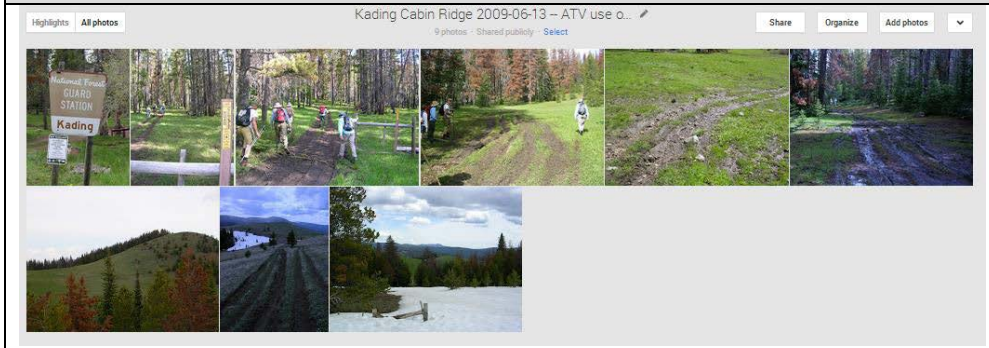
Comments	Response to Comments
Dear Ranger DeGeest, I urge you and your staff to protect the Continental Divide National Scenic Trail (CDNST) and other areas as roadless lands for the benefit of the wildlife, wilderness and human enjoyment of these quiet treasures. 1. Please adopt Alternative #3 for Nevada Mountain. 2. Please extend year round motor-free management of the headwaters of the Little Blackfoot to the roadless lands along the CDNST from Bison Creek to Upper Ontario Creek. 3. Protect ALL of the CDNST by keeping the entire length non-motorized year round. 4. Continue your efforts to restore and rehabilitate forest areas that have been damaged by vehicle damage. Designate Sweeney Creek area as non-motorized and extend this quiet area up to the CDNST(88-1). Thank you for your thoughtful stewardship of our national forests! Carl Deitchman -- Carl Deitchman 1121 Hollins Ave. Helena, MT 59601 406-422-3008 (Cell)	
(89) From: jim emerson <alpinepots@yahoo.com> Sent: Monday, June 09, 2014 9:18 PM To: FS-comments-northern-helena Subject: Divide Travel Plan Attachments: IMG_6359.JPG Welcome District Ranger DeGeest! I would like you to fully protect the Continental	(89-1)Thank you for your comment.

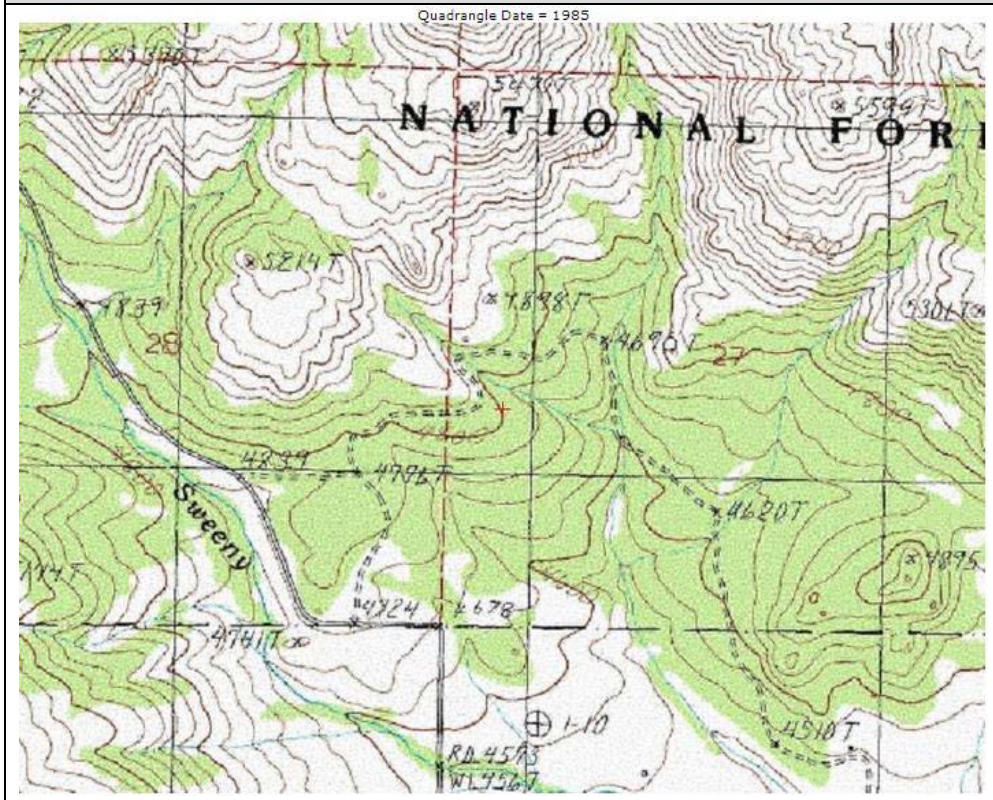
Comments	Response to Comments
Divide Trail and the wild places that that surrounds it. Please adopt Alt. #3 and protect the corridor surrounding the CDT, in particular Nevada Mountain, a place where most of the species here for Lewis and Clark remain (89-1). Thanks for your consideration. Jim Emerson Bx 237 Helena, Mt. 59624 	
(90) From: Eliza Frazer <eliza@montana.com> Sent: Monday, June 09, 2014 8:47 PM To: FS-comments-northern-helena Subject: Continental divide plan No additional use beyond agreement Hello sirs Nevada mountain, the headwaters of the Little Blackfoot and the general continental divide area in the Helena forest should NOT be considered for additional snow mobile use. No plans have allowed use where it is now being considered. Nevada mountain must remain as a year around roadless area (90-1). This is important area for wildlife habitat, and one of the few undisturbed landscapes. Water is every day becoming a more precious resource, and continued encroachment can only lead to further compromises.	(90-1)Thank you for your comment. Refer to Alternative 5.

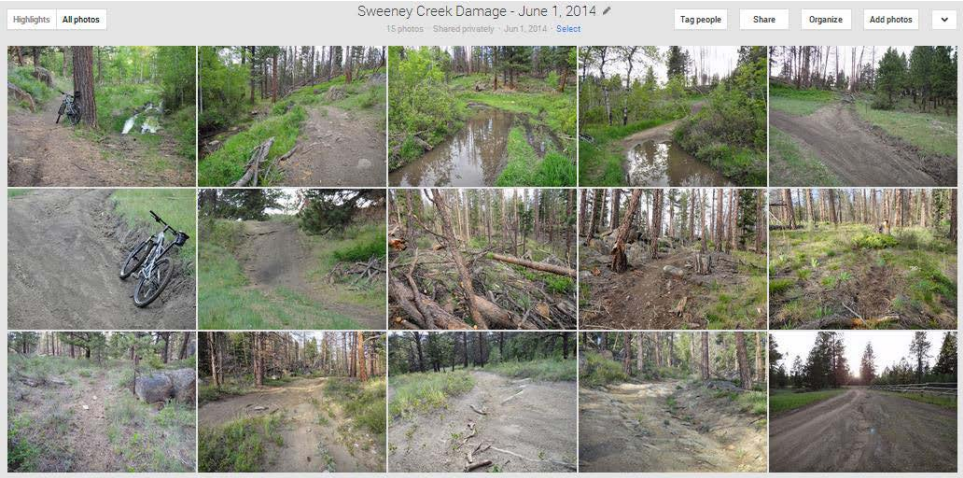
Comments	Response to Comments
Our landscapes can and do provide enjoyment for many, and it is so important to take note of the very successful Blackfoot Challenge area that includes area for non-motorized travel as well as skiing, snowmobiling, ranching, fishing..... Thank you for your consideration. Eliza Frazer Barry Hood Sent from cloudless skies!	
(91) From: Bill Hallinan <wjhallinan@gmail.com> Sent: Monday, June 09, 2014 12:22 AM To: FS-comments-northern-helena Subject: Divide Travel Plan Attachments: Divide Travel Plan Comments -- Bill Hallinan.pdf Greetings, Please see attached comments for the Divide Travel plan. Please contact me if you have any questions. Sincerely, Bill Hallinan 438 Clarke Street Helena MT 59601 406-461-9876 c 406-449-2701 w June 12, 2014 Heather Degeest Helena District Ranger,	

Comments	Response to Comments
Helena National Forest 2880 Skyway Lane Helena, Montana 59602 Re: Draft Continental "Divide" Travel Plan and Draft Environmental Impact Statement Dear Ranger Degeest, My comments below are my personal observations. They are made independent of my volunteer participation with the Montana Wilderness Association and the High Divide Trails Partnership. 1) Thank you and the many Forest Service staff and contractors who have spent thousands of hours over the last many years analyzing the many details of this forest plan. For the most part I find the documents thorough, complete, and consistent. My following comments are intended to improve and support forest travel plan.	
2) Specifically, I support Alternative 3 because it balances the necessity of providing transportation for forest management and recreation while simplifying the number and categories of route restrictions It is a clear alternative (91-1).	(91-1)Thank you for your comment.
3) Alternative 3 can be improved by clarifying the where motorized over the snow travel is authorized to occur Please restrict over the snow travel in and near the inventoried roadless areas (IRA). Why?(91-2) a. Encroachment in these areas is inadvisable from a winter wildlife perspective, e.g. wolverines and Canadian lynx are impacted;(91-3) b. A pre-existing negotiation including snowmobile clubs and conducted during the Lincoln District Winter travel planning process agreed to restrict over the snow travel in IRAs, especially in the Nevada Mountain area. This agreement was to carry	(91-2) Refer to Alternative 5. (91-3) Effects of snowmobiles on lynx and wolverines are discussed in respective sections of the Wildlife Background Report (p. 98, 102, 193-201, 204-207) and in equivalent Wildlife sections in the FEIS. All action alternatives reduce the potential for snowmobile use in lynx habitat—areas also known to be inhabitated by wolverines in winter. (91-4)Thank you for your input.

Comments	Response to Comments
over into the Helena District Winter Travel plan for the Nevada Mountain Area (91-4).	
c. We cannot predict the future of how over the snow designs will develop and what capability they will have. An increase in motorized capability of over the snow vehicles should not grant access to sensitive areas, just like owning a fast car does not allow one to speed- For clarity, please make the off-limits for motorized travel in IRA be the same in winter and summer, granting the possibility for small, well known exceptions. The more seasonally and geographically consistent the plan is the easier it will be to understand and enforce.(91-5)	(91-5) Refer to Alternative 5.
a. I support the trail closures to the west and south of Kading Campground. Especially the closure of the Kading Grade trail (heavily eroded) and the trail behind the Kading cabin which continues to deteriorate each season. I support loop routes north of Kading Campground (91-6). To keep ORV traffic off unauthorized routes going south along the Kading ridge, the ridge access needs to be gated and posted (91-7). Please see these pictures from 6/13/2009 where I documented the damage behind at Kading Cabin, and ATV users pioneering an unauthorized route on the ridge lines. This is a Google Picasa photo album: https://plus.google.com/photos/107719244359257593277/albums/5348128065254842465 .	(91-6) Refer to Alternative 5. (91-7) The preferred alternative does limit motorized use in this area; a connecting route was left intact that allows connectivity from the little Blackfoot to the Elliston area.
In addition to the photo, each photograph has a caption that provides more reference, as screen shot of the photo site.	

Comments	Response to Comments
 4) Please know I support responsible, legal motorized travel where appropriate. I've owned, raced, and traveled by motorcycles. Nevertheless, I support the closure of Sweeney Creek to motorized use for a number of reasons. a. Historical. The USGS name atlas and Helena National Forest Maps from the 1 970's to 1990's names this area as the Sweeney Creek Ecology Trail (http://en.wikipedia.org/wiki/List_of_trails_of_Lewis_and_Clark_County,_Montana). So when did the ecology trail become a motorized playground? Elk winter there A natural wildlife route funnels from there up Sweeney Creek to the Divide. It serves as an important buffer between Helena and the Continental Divide wildlands. On the USGS map in 1985 there was one jeep trail No other trails (91-8).	(91-8) The value of lower Sweeney Creek as wildlife habitat is discussed in the Wildlife Background Report (p. 271-274) and in an equivalent section of the FEIS. Alternatives 3, 4, and 5 eliminate motorized use in this area.

Comments	Response to Comments
 b. Resource Damage. I've been to Sweeney Creek a couple of times to inspect the area. On June 1, 2014. I spent 1.5 hours traveling along the southern fence line of the Sweeney Creek area. I counted 10 unauthorized routes in a one mile area at the southern boundary I saw at least 12 circuitous routes. Only one route was located so it protected the trail bed. I documented four examples at this Google Picasa photo album: https://plus.google.com/photos/107719244359257593277/albums/6022691138171079361?authkey=CJ62_9f2jY2k0QE . In addition to the photo, each photograph has	

Comments	Response to Comments
a caption that provides more detail For reference, as screen shot of the photo site.  c. Sweeney Creek Motorsports Park Having grown up riding motorcycles daily and racing motorcycles throughout the summer, I am very familiar with how quickly and to what extent motorized vehicles can damage an area. What I see in Sweeney Creek is the establishment and expansion of a motorsport play area, but without any of the boundaries that normally go along with such an area Building motorsport parks is part of community planning, not forest travel planning activity. Communities solve the need for motorized play through establishing a designated area and clear boundaries. Spokane Washington, for example, has three areas dedicated to ORV use. See them here on Google Maps. Notice the use pattern and how it is similar to what is happening in Sweeney Creek. Nine Mile: https://www.google.com/maps/place/Spokane,+WA/@47.7378072,-117.5475712,2320m/data=!3m1!1e3!4m2!3m1!1s0x549e185c30bbe7e5:0xddfcc9d60b84d9b1 Spokane Raceway:	(91-9) The Sweeny Creek are is protected in the preferred alternative

Comments	Response to Comments
https://www.google.com/maps/place/Spokane,+WA/@47.6613944,-117.5859801,1162m/data=!3m1!1e3!4m2!3m1!1s0x549e185c30bbe7e5:0xddfcc9d60b84d9b1 Liberty Lake Regional Recreation Area ORV park: https://www.google.com/maps/@47.639143,-117.0460659,581m/data=!3m1!1e3 d. No Limits. No Enforcement. One cannot rely on natural obstacles to limit expansion of the unauthorized motorized use, because naturally these obstacles — rocks, steep hillsides, fallen trees, etc. — are there to be overcome. Nature is not a liming factor. Unauthorized routes will expand. Most motorized users do not self-police (how many motorized users turn other motorized users in for going off route?) and by extension, do not realize the consequences of their actions. At the first sign of a problem the motorized community might have borne the issue with signage to educate the motorized community about balancing access with responsible use. A motorized club sponsored sign or notice or boundary marker or route marker — those did not happen. Now it is the Forest Service's job to enforce. If the bad actors are unaware and uneducated, or aware and unstoppable, then an effective enforcement action is closing the area. Everyone gets the message about unauthorized routes, while all still have access to designated routes (91-9).	(91-10) Thank you for your comment.
5) Please consider working with the Prickly Pear Land Trust, the Wild Divide Chapter of the Montana Wilderness Association, the City of Helena Parks and Recreation, the Helena Bicycle Club, and the Lewis and Clark County recreation planners to establish a non-motorized walking/biking trail from the heart of Helena to the Continental Divide. I want the Queen City of the Rockies to have a direct link to the Crown of the Continent. If there are routes proposed by commenters that will work to connect our town to the back bone of the Continent and do it in such a way to respect wildlife and quiet recreation values, please lend your support by opening or closing trails to make a connecting route possible via Forest Service land. A route is not proposed but some possibilities could be: a. Mount Helena Ridge Trailhead to Lazyman Gulch and Ten Mile Recreation Area; b. LeGrand Canyon Blvd along the water flume then crossing near Baxton Dale	(91-11) Thank you for your input.

Comments	Response to Comments
Road or Sweeney Creek Road; c. Extend the Helena Centennial Trail, perhaps parallel to the rail system toward Mullan Pass and then onto Forest Service land. d. Other unknown ideas ...(91-10) 6) Please consider the possibility of having all 75 miles of the Continental Divide National Scenic Trail roadless or at least on closed roads (91-11). I know this sounds impossible given the number of roads the CDT follows in the Divide Travel planning area, but I suggest the idea because it is worth inspiring others and aspiring to making the CDT a gem in the Helena District I want hikers and visitors to say, "Wow, that stretch around Helena was awesome!" rather than "Too many roads, too many cars, could not wait to be past it." Which, incidentally, I heard that once from a thru-hiker, which was once too much for me. (May his water bladder leak just a little and dampen his trail arrogance.) Keep up the good work. Thank you for your consideration. Sincerely, Bill Hallinan/s 438 Clarke Street Helena MT 59601 406-461-9876 c 406-449-2701 h wjhallinan@gmail.com .	
(92) From: Barb Harris <harrisch@bresnan.net> Sent: Monday, June 09, 2014 9:48 PM To: FS-comments-northern-helena	(92-1) Thank you for your comments.

Comments	Response to Comments
Subject: Divide Travel Plan Dear Forest Service, I am writing regarding the recent draft of the Divide Plan, the beginning of your agency's consideration of wild lands that mean a great deal to the Continental Divide ecosystem and to our community. The protection of only 20 miles of 75 on the Helena Ranger District is indefensible, as is the conclusion that motor vehicle use is appropriate in these areas that clearly are best suited to protection from such human consumption. Please weight heavily the wildlife that live in the Nevada Mountain proposed wilderness, the headwaters of the Little Blackfoot, the 2005 agreement regarding winter use, the need to rehabilitate the lower Sweeney Creek areas, and any and all of the natural characteristics of the lands affected by the plan. We recognize your agency's daunting task of finding a balanced plan, but support any and all actions you take to protect that which cannot be regained once lost. Please make the plan what it should be - a comprehensive, detailed plan of the best options for this particular and unique area. Thanks for your consideration, Barb & Don Harris 6 South View Road Clancy, MT 59634	
(93) From: MtBigMac@aol.com [mailto:MtBigMac@aol.com] Sent: Monday, June 09, 2014 11:02 PM To: FS-hlcplanrevision Cc: kstacey@mt.gov Subject: Forest Plan Revision Comments	

Comments	Response to Comments
My name is Tom McDaniel and I wish to comment on the Continental Divide Travel plan. I live at 7235 Priest Pass Road in the Sweeny Creek area. My property borders USFS land on Priest Pass Rd. adjacent to the cattle guard and parking area for forest users. I have lived at this location since June of 1985 or 29 years. Over this 29 year period the USFS land has degraded severely due to over use by the public. During the 1980s, ATVs were not as common and kelly humps prevented larger vehicle from using old trails in the area. There were few roads. Deer, elk, and grouse were abundant and occasionally you could see bear and moose. The only elk I have seen in recent years in this area are carcasses brought in and dumped on USFS land. The area has become a trash dumping area for furniture, TVs, computers, shingles, nails, pallets, concrete, human waste, condoms, toilet paper, glass, tires etc. Recently heavy equipment has been used to take boulders off USFS land. My sons last year turned in a person using heavy equipment removing large living trees which resulted in a conviction of the perpetrators. As a result of all the vehicle traffic Knap weed, White Top, Canadian Thistle and other noxious weeds have spread along every trail. Spring is especially annoying when around 2:00 AM during rainy periods loud trucks will race thru the meadows ripping up soil and thus spreading noxious weeds. I have personally photographed people racing around and tearing up land and turned these over to USFS law enforcement. One can find areas where a person has driven their vehicle in circles tearing up the grasses. Another activity taking place close to residential areas is the firing of large caliber weapons. I was a firearms instructor and Special Agent of the FBI for 24 years and know something about firearms safety. On one occasion while riding horseback along a trail, individuals started shooting and limbs above my head were being struck with rounds. My horse wasn't all that understanding. From my observations many people shooting weapons on forest service land use no backstop for their rounds to safely go into and it is just a question of time before someone is severely	

Comments	Response to Comments
injured or killed. Plus living in close proximity to the shooting makes not only our livestock but us feel less than safe. The fire danger to area residence has increased drastically over the years with more people camping out or having keggers where fires are just left to burn when the party is over. We have reported numerous abandoned campfires in the area and have been lucky that a major fire has not broken out in the area thanks in large part to the quick response to forest fires by Baxendale, State Lands, and USFS personnel. Weekends during the warmer months tend to have a lot of two cycle dirt bikes racing not only on USFS land but up and down Priest Pass Rd. These vehicles are going way over the speed limit on Priest Pass Rd but also are driving way too fast for the safety of anyone who might want to ride a horse in the area. The dust being kicked up is a health hazard as well. The other major activity occurring every weekend is paint balling. To their credit the participants have gotten better over the years about shooting at signs and on to private property but in the past I have had a horse shot in head by paint ballers. Every year new trails made by dirt bikes and other atvs appear on the forest lands. The number of roads has gone from few to many some paralleling older trails just a few feet away. This area is being severely abused and something needs to be done to stop vehicle traffic of all types. I have an ATV and enjoy getting my firewood on USFS property but I will gladly cease using a vehicle to end the destruction of this area. I therefore request that Alternative Number 3 be adopted to ban motorized vehicle use in the Sweeny Creek area yearlong (93-1). Thanks, Tom McDaniel, tele # 406-442-7225.	(93-1) Thank you for your comment.
(94) From: Iris Basta <ibasta@bresnan.net> Sent: Tuesday, June 10, 2014 7:18 AM To: FS-comments-northern-helena	

Comments	Response to Comments
Subject: Divide Travel Plan Dear Ms. Heather DeGeest - I am sure you know by now that Montana's forests and wildlife are priceless! Because of this, many of us are hoping that you will fully support protection for the Continental Divide Trail and the surrounding wild lands and adopt Alternative #3 and the CDT corridor protections (94-1). I also want to thank you for your support in rehabilitating vehicle damaged Sweeney Creek so that it becomes a non-motorized area. We believe that this quiet area should be extended to the Continental Divide trail plan. We hope that you also support this action! Best wishes to you as well!	(94-1)Thank you for your comment. Refer to Alternative 5.
(95) From: paul blumenthal <blumensteindesign@gmail.com> Sent: Tuesday, June 10, 2014 6:46 AM To: FS-comments-northern-helena Cc: pblumenthal@mt.gov Subject: Divide Travel Plan Helena Ranger Heather DeGeest: I urge you to fully protect the Continental Divide Trail and surrounding wildlands by adopting Alternative #3 and the CDT corridor protections. In addition, I ask you to protect Nevada Mtn wildlands, all Little Blackfoot roadless lands. Please extend motor-free management of the headwaters of the Little Blackfoot to the roadless lands along the CDNST. Please protect the CDNST by keeping it un-motorized (95-1). Also, thank you for rehabilitating vehicle-damaged Sweeney Creek as a proposed non-motorized area and extend this quiet area to the CDNST. Thank you for your consideration,	(95-1) Thank you for your comment. Refer to Alternative 5.

Comments	Response to Comments
Paul Blumenthal 1217 W Platinum Butte, MT 59701 Sent from my iPhone	
(96) From: John Ratliff <dadjgr@gmail.com> Sent: Tuesday, June 10, 2014 1:15 PM To: FS-comments-northern-helena Subject: divide travel plan Heather, First, thank you for rehabilitating vehicle damaged Sweeney creek as a proposed non-motorized area. I ask that you please extend this quiet area to the CDNST. In addition, this email is to urge you to fully protect the CDT and its surrounding wildlands by adopting Alternative #3 and the CDT corridor protections. Please extend year round motor-free management of the headwaters of the Little Blackfoot to the roadless lands along the CDNST from Bison Creek to Upper Ontario Creek. Please protect the CDT and surrounding area by designating these areas and trails as year-round non-motorized: MacDonald Pass to Priest Pass, Priest to Mullan Pass, Greenhorn Mountain and Meyers Hill-Nevada Mountain (96-1). Thank you for all you do! Debbie Daniel	(96-1) Thank you for your comment. Refer to Alternative 5.
(97) From: Candace Durran <candu5@bresnan.net> Sent: Tuesday, June 10, 2014 10:28 PM To: FS-comments-northern-helena Subject: Divide Travel Plan	(97-1) Thank you for your comment.

Comments	Response to Comments
Please implement Alternative 3 and the CDT corridor protections. Thanks for your restoration work in Sweeney Creek (97-1). Candace Durran 1120 Stuart St. Helena, MT 59601 "Our intentions tend to be much more real to us than our actions, and this can lead to a great deal of misunderstanding with other people, to whom our actions tend to be much more real than our intentions." E.F. Schumacher	
(98) From: Jerry Koon <JKoon@mttunnels.com> Sent: Tuesday, June 10, 2014 8:18 PM To: FS-comments-northern-helena Cc: Brad Koon; elk@koonskabin.com; koon440@hotmail.com; bigsky22@blackfoot.net; Edward.Koon@Halliburton.com; jon.koon@advanced.pro Subject: Divide Travel Plan Comment To: Helena District Ranger, Helena National Forest Re: Continental divide Travel Plan First, I would like to express my extreme disappointment and anger at the fact that none of the travel plan “Alternatives” include increased, or even normal, access for wheeled motorized vehicles. For us elderly citizens, and some handicapped younger people I know, the Forest Service, in collusion with our US Government, is effectively locking us out of our public lands. I hope one day the handicapped access laws find their way into Forest Service “Regulations”! That said, with four, no win Alternatives to choose from, please accept this	(98-1) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. In all alternatives motorized opportunities are provided and within those motorized routes there are different skill levels provided for elderly and disabled use.

Comments	Response to Comments
comment in favor of Alternative 4 (98-1). Sincerely, Jerry Koon 50 Poison Patch Road Hall, MT 59837	
(99) From: Jon Koon <jonkoon@gmail.com> Sent: Tuesday, June 10, 2014 10:49 PM To: FS-comments-northern-helena-helena Subject: Continental Divide Travel Plan #24091 Concerning the Continental Divide Travel Plan, I would like to add a comment in favor of alternative #4. Many areas in alternative 4 allow over-the-snow vehicles, but do not allow wheeled vehicle access. I would prefer a plan with more wheeled vehicle access. Concerns about such use could be mitigated in a manner that does not involve blanket prohibiting. It seems like "travel prohibition" cannot be considered "travel management". Prohibition is the easy way out and does not consider all those who desire to access the land that their tax dollars are managing (99-1). Sincerely, Jon Koon 5820 Patterson Road Bozeman, MT 59718	(99-1) Thank you for your answer. The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities.
(100) From: Stacey, Kathy [mailto:kstacey@mt.gov] Sent: Tuesday, June 10, 2014 10:40 AM To: FS-hlcplanrevision Subject: Continental Divide Travel Plan	

Comments	Response to Comments
June 10th,2014 Our name is Ron and Kathy Stacey and would like to take a moment to comment on the Continental Divide Travel Plan. We live at 7480 Priest Pass Rd in the Sweeny Creek area and bought our land in June 1982 and built our house in 1988. Our land borders USFS. The land has gone through many changes do to abuse from the public. Once thriving with wildlife and great place to take picnics with family and horse rides with a few roads in and out now looks like a junk yard with roads everywhere do to ATVs, motor cycle, pickups that have causing erosion everywhere . It has old couches, chair and garbage and just about anything you can imagine. We have tried so many times to clean up but it is beyond anything we can do. They have parties, meth labs, and free run with no regards to anyone or the land. Every weekend in the summer the paint ballers have a get together. After many talks with them and Law enforcement being called for shooting up signs and our neighbor's horses are shot they have gotten better. Every year we have so many run-ins, with motor cycles racing up our roads with no regards for safety, going through our fences in back almost letting our horses out to get hurt. There were no trails they just race through the forest and go where they like. The last time we road my horses back there she picked up a nail. You have to be so careful and watch for of all the junk. They use it for a dumping ground. This is a nonstop problem. Every year it gets worse. The forest service made a fire line around the properties and that made a great trail for the motor cycles. Every year we have people camping in no camping areas having a fire with no water to put fires out. We have put fires out and called Law Enforcement but they can't be everywhere. It is a matter of time before we have a fire. It is going to be a dry year and we all worry about a fire not to mention the cost. I know we live in the forest and live with hunters with no problems, but people drive in the back and shoot everywhere they want with no regards for safety. It is just a matter of time before someone gets killed. This problem that is not going to go away its just gets worse. Every year you have motor vehicle making new roads and erosion is getting worse. I	

Comments	Response to Comments
would like to see the land preserved for generations to come. Taking a picnic and riding your horse back in this area is a dream. It would be great to be safe and preserve the land. We have an ATV and have road back there and stayed on the trail, but would gladly give up that privilege for preserving the land from further destruction. I would respectfully ask that Alternative Number 3 be adopted to ban motorized vehicle use in the Sweeny Creek area all year long. It will make a big difference and preserve this great place to take your family. Thank you so much. Ron and Kathy Stacey 406-442-7772(100-1)	(100-1) Thank you for your comment. Refer to Alternative 5.
(101) June 10, 2014 Transcribe from hand written letter Mailed on June 10, 2014 Dear District Ranger DeGeest, I am responding to the upcoming important decisions about the Helena NF District Divide Travel Plan. In 1997 I hiked from MacDonald Pass, north to Waterton N.P. and passed through the Nevada Mt. area and Priest Pass / Mullen Pass areas. Nevada Mt. was surprisingly scenic, pristine, and rugged. The in fact landscape reminded me of an area in the Scapegoat Wilderness Area along Straight Creek. Yes, I was surprised at the Wildness and quiet landscape, so close to home in Helena. The Priest Pass/Mullen Pass areas were surprisingly pristine and quiet, once off the intersecting roads. There are important bogs and wetland areas along the CDT to Mullen Pass and a historic trail crossing over the railroad tunnel. In 2011, I hiked with 2 friends, not solo this time, from MacDonald Pass south, along the CDT to Chief Joseph Pass at the South end of the Bitterroot Valley.	(101-1) Thank you for your input (101-2) Thank you for your input (101-3) Thank you for your input

Comments	Response to Comments
Electric Peak was the top, scenic and pristine intact landscape from Helena to Butte. Electric Peak has spectacular view of Helena NF and the Beaverhead-Deerlodge NF. This area needs protection and was the highlight of walking the CDT from Helena to Butte. (101-1) There really needs to be buffer zones along the CDT in all the national forest. Beaverhead-Deerlodge, Butte District has done a good job of creating, protecting, maintaining a buffer corridor along the DCT south of Homestake pass to the Highlands. (101-2) This section of the CDT goes close to Butte subdivisions, but I never knew this while I was on the thru-hike, only afterwards while returning to look for a pair of lost sneakers! We need these corridors, buffers of protection along the CDT. (101-3) In 1997, I wanted to hike the CDT because it was in my backyard, and I know people from all over the world would be coming to thru-hike, this magnificent idea of the Continental Divide Trail, north-south across N. America. And I was right! I have met thru-hikers from Washington, D.C., Italy, Finland and many other places in the U.S. and Canada, while I was out hiking the CDT. We have a great world resource in our back yard! I feel it as a privilege to protect, conserve, buffer, and educate about the CDT. Please fully protect the Continental Divide Trail, our backyard resource, and the surrounding wildlands of the CDT areas by adopting Alternative #3 and the CDT corridor protections. (101-4) Sincerely yours, Jennifer Thompson 1205 Winston, Helen, MT 59601 549-1095	(101-4) Refer to Alternative 5.
(102)	

Comments	Response to Comments
From: Ronnie Vanzant <jakeacres@gmail.com> Sent: Tuesday, June 10, 2014 11:14 PM To: FS-comments-northern-helena-helena Subject: Divide Travel Plan I don't think it's fair to be considering closing more roads in the HNF to motorized users when we have no designated OHV areas in the Helena National Forest now, outside of the tiny Sweeney Creek area, which is too small to even use, and is close to residences who are complaining! The HNF should make some shared use trails like they do in the Lewis and Clark NF. They managed to do it. There are plenty of other OHV trails in the United States where the trail is open to all uses, with a system of right-of-way. This Travel Plan should be considering the rights of all of us. Wasn't the Forest ordered (in about 2008) to implement some TRAVEL PLANS for motorized users? The one proposal where the Forest is going to expand the system ---by a mile or 2 ----is a slap in the face to many Montana residents who use ATVs to get out in the woods and enjoy our public lands. Absolutely terrible! And the other plans are even worse. If you can't make an improvement, then please leave it alone. (102-1)	(102-1) Thank you for your input
Motorized use is growing. It wouldn't be wise to make rules that will incite law breaking. If you don't give motorized users a place to use their ATVs and motorbikes, you will see a lot more people disregarding the law, because it is not FAIR, and will likely not be followed. But, if you designate routes that are significant enough, it will serve everyone's best interest, with no animosity toward the hikers and horse people, who have more than enough trail already designated to only themselves. Please do the right thing and expand the trails that are open to OHVs. Because, like it or not, if you don't provide a place for all the motorized users of the present and future, they will make their own routes. (102-2) Thank You.	(102-2) Resource management is a blend of Social economic/political needs balanced with biological/ environmental needs. Refer to Alternative 5.

Comments	Response to Comments
(103) June 9, 2014 – Received: June 11, 2014 ATTENTION: Heather DeGeest, District Ranger Helena Ranger District Helena National Forest 2880 Skyway Drive Helena, Montana 59601 SUBJECT: Divide Travel Plan Ms DeGeest: Thank you for the opportunity to be able to comment on the pending Divide Travel Plan. Enclosed please find 6 comments on some of the aspects of the plan that I would like you to consider in your deliberations. In addition, via this letter, I would like to offer some general comments about the plan. First of all to offer a perspective of where I am coming from, I am a 68 year-old, third generation Montanan and second generation Helenan. Through the years I have enjoyed our forests through mountain biking, hiking, camping, cross country skiing and now ATV riding. In addition, our family has a cabin in the Elkhorns. I truly believe that we live in God's paradise here in the Prickly Pear Valley surrounded by the Little Belts and the Elkhorns. As I begin to experience some of the limitations that accompany the "Golden Years", I am thankful for the ability to continue the enjoyment of visiting our vast countryside via the invention oats and UTVs. However, as our group rides, we are finding more and more trails being closed off, both by the government and private interests. I fully realize that our ability to ride trails that someone else has control over, is solely dependent on good will and generosity.	

Comments	Response to Comments
Much of the area that the Divide Travel Plan encompasses incorporates many historic mining districts that were critical to the development of Montana. As an amateur historian, I greatly enjoy visiting these areas and visualizing the activity that developed them. Many of these properties predate the founding of your agency. Once again, I realize that along with the allure of historical wonder, there is also the curse of damage left unresolved. Another issue that seems front and center in the DEIS, is that of wildlife. Unfortunately I am not a biologist, botanist or wildlife expert; however I do have some opinions about this. As we ride the trails, and I am looking around for game, my vision is impaired by a whole lot of vegetation that, except for the recent pine bark beetle scourge, seems rather healthy in the Divide area. It does not seem to me that the animals have all that much problem finding hiding cover. Also as we ride up on ridges and mountain tops and look out over the scene around us, I am continually amazed at how much country there really is that game can travel, propagate and exist in without coming in contact with the scourge of the human race. It has also been my experience as we have ridden that when we encounter game, it usually just moves off into cover until it feels safe and then watches us drive by. And my final thought on the game issue is that the development activity in the Divide area began in the late 1800's. If one considers that a generation of animals in the wild is usually 20 years or less, there have been at least 5 or 6 generations of animals that have lived and adapted to human intervention in their territory. I don't think that leaving the existing trails operable will have an adverse effect on the animal populations. (103-1) I am a great believer in the adage "If it ain't broke, don't fix it". When we ride the Divide area, I don't see a whole lot that is broken. For the most part the trails and adjacent areas are in decent condition. Yes there are a few areas that either need some work or need to be closed off, but not nearly to the extent that this plan is advocating. And, yes there are slob riders, just as there are slob campers and slob hikers and slob hunters. Unfortunately, that is going to be a continuing problem no matter what is done with the trail systems.	(103-1) Most of the trails that we are proposing to close as motorized routes are causing site-specific problems for wildlife in one way or another. Most often, they disrupt local habitats that tend to focus wildlife activity—wet meadows, riparian areas, aspen stands, calving areas, travel corridors, etc. The mountain pine beetle is exacerbating the problem in many areas, taking away cover that, as you have noted, has made it possible for elk and other animals to buffer themselves from trail riders. Some of the site-specific problems we are looking at are discussed in the section "Local Effects in Key Areas" in the Wildlife Background Report (p. 242-282) and in equivalent sections of the FEIS.

Comments	Response to Comments
My experience in riding ATVs is that most of the other riders we have encountered have been respectful, courteous and caring for the forest. I do not believe that we are a detriment to the forest and, in fact, we can be an asset for the Forest Service. Each year, I read in the paper how resources for managing the forest are becoming more and more limited as money goes to fight fires and Congress tightens the fiscal belt. With the establishment of a communication conduit, between the ATV riders and your agency, we could be eyes and ears on the ground for you. As it is, our group removes trash, maintains trails, and performs other tasks as we ride. I believe that the various ATV riding groups can contribute to the goals and mission of the Helena Ranger District. Once again, thank you for the opportunity to comment on the Divide Travel Plan. Sincerely, James B. Brown 1520 LeGrande Cannon Boulevard Helena, Montana 59601 406-442-3608 The following is transcribed from 6 Comment Sheets for the project… Right Hand Fork of Jerusha T.08N R08W sec5 This Road has existed since early mining days and remains in fairly good condition as an ATV trail connecting mining claims and lost Horse Road. Please consider leaving this route open for ATV and snowmobile use. (103-2) Bison to Monarch	(103-2) This is a small segment of road on National Forest with no known public access.

Comments	Response to Comments
Roads 4104 A1 and 4104-A2 T8N-R6W sec 19-20-28 At present A1 & A2 are closed to wheeled vehicles. Alts 2 & 4 recommend opening these routes. I support this recommendation that would allow inter-connection between the Little Blackfoot & Telegraph Drainages at the upper end allowing for a "loop" ride. (103-3)	(103-3) Please see alternative 5. (103-4) Refer to Alternative 5, and the Fisheries Report.
DEIS – Page 6 Closing of creek/river crossings @ existing fords until bridges or culverts are installed. Two existing fords – Little Blackfoot River accessing evening star & negro mountain and bison creek on 4104-A2 are "Hard Bottom" crossing that have handled wheeled traffic for many years without adverse results. It does not seem reasonable to close these until the normal bureaucracy designs, Bids & constructs crossings. Please leave these open in the interim. (103-4)	(103-5) Refer to Alternative 5.
Clarks Canyon Road 4005-005 & 4005-001 T10N R07W sec 1 These roads are currently in decent condition & provide good opportunity for access between Dog Creek & Clark's Canyon. I do not understand why these are designated "unauthorized" when they have a system road designation. They are recommended to be open in Alts 2, 3 &4. I concur with this recommendation. Hard Luck Mine & Bison Mtn – 4104-A1 T8N – R6W – Sec 19, 20, 21, 28.	

Comments	Response to Comments
This trail allows access to historic mining properties & should be kept open not only for continued access to these properties, but also for hunting access which is popular in this area. Julia Mine – Glacier Pot Hole Road 1859-E1, 1859-D4, & 1857-D1 T08N – R06W Sec 16, 17, 8. These roads/trails provide access into the historic Julia Mine area and also provide critical connection between system roads 1857 & 495. There seems to be some confusion between the alternative whether these are open to remain open or are closed remain closed. Regardless, I am in favor of opening the routes per Alt #2. (103-5)	
(104) From: Raymond Brown <rayb003@gmail.com> Sent: Wednesday, June 11, 2014 9:00 AM To: FS-comments-northern-helena Subject: DIVIDE TRAVEL PLAN 1. Adopt alternative number 3 to keep Nevada Mountain Wild. 2. Protect all Little Blackfoot road less areas, - extend the year management to the headwaters of the Little Blackfoot. 3. It is crucial to Protect the CDNST to keep it non-motorized. 4. A thank you to District Ranger DeGeest for his work in the Sweeny Creek Area Keep it non-motorized and quiet extending it to the CDNST. Thank you for you work/	(104-1) Thank you for your input.

Comments	Response to Comments
Raymond D. Brown, Sr. 6162 Lazy Man Gulch Helena, MT 59601 406-443-0994	
(105) From: William Carrigan <carrigan@initco.net> Sent: Wednesday, June 11, 2014 11:46 AM To: FS-comments-northern-helena-helena Subject: Comment - Divide Travel Plan USDA Helena National Forest Helena Ranger District 2880 Skyway Drive Helena, MT 59602 June 11, 2014 Ladies and Gentlemen: We submit the following comments to the USDA Helena National Forest (HNF) for consideration of proposed changes to the motorized vehicle plan as discussed in the Divide Travel Plan Draft Environmental Impact Statement (EIS), and the Forest Plan Programmatic Amendment. My family and I have lived at 7500 Priest Pass Rd since early 1993. I am a professional geologist/hydrogeologist, and we are all avid outdoor enthusiasts. In the 21 years that we have lived in the Sweeny Creek area we have witnessed many changes. Most of the changes we have witnessed are the result of an increase in motorized use and traffic in the Sweeny Creek Area. In particular, in the past 5-10 years, motorized use on motorized trail roads (MTR) and in many instances,	(105-1) Thank you for your comment. Alternative 5, the Sweeny Creek and Priest Pass areas will be closed to wheeled motorized travel.

Comments	Response to Comments
unauthorized trails in the Sweeny Creek area has increased several fold. The results have been erosion of topsoil, encroachment of noxious weeds, excessive garbage, firearm violations, destruction of private property, trespassing, harassment of livestock on private property, noise, dust, contamination of water-quality in the Sweeny Creek drainage just to name a few. We are increasingly saddened to watch the assault of a publically owned natural resource by self-serving motor enthusiasts who have the general attitude that an ATV or trail-bike gives them the right to blaze a path on public land, and in some instances, private land where none existed. I have witnessed numerous times during the last 5 years motorcycles and ATVs traveling behind our property (near its east boundary) using a fire-line as an undesignated trail to connect the network of trails such as MTR-008 with a former footpath that was part of the Sweeny Creek Nature Trail (NE4NW4 section 27). During this time we have experienced a bullet traveling overhead as we worked on our deck attached to our home. We have seen aspen trees on our property vandalized and 'cut-in-two' by a shotgun blast by an unknown trespasser. We have experienced trampled and/or cut fence by hunters dragging deer across our property to access Priest Pass Road from forest service land. We have found more than one 'poached' moose carcass lying next to Priest Pass Road on USFS land in section 28 (NW4NW4). We have seen garbage dumps of roofing shingles, wood pallets, computer parts, beer cans and bottles at sites next to or at the end of numerous MTRs and Priest Pass Road. A small minority of the public seem to think it is OK to use Priest Pass Road and its network of trails as a county dump. And last year on a day in May and while hiking with my dogs I discovered two wildfires next to MTR-004 started by arsonist. Motorized use in the Sweeny Creek Area is 'out of control' and will only worsen if nothing is changed, and restrictions are not imposed by the USFS. We think motorized use in the Sweeny Creek Area has reached a 'tipping point'. Thus, we support a decision selecting Alternatives 3 and 4, which will close all wheeled motorized traffic on all MTRs in the Sweeny Creek Area. We do not see how the USFS can allow the current system of motorized recreational use in the Sweeny Creek Area to continue. We not only support closure of all motorized traffic on MTRs in the Sweeny Creek Area, but think strict enforcement is necessary to	

Comments	Response to Comments
change the public's perception. Gates, fencing, and signs posting restrictions (similar to the gate at 1802-B2) and imposing fines are needed to restrict access and use at each trailhead location on Priest Pass Road. (105-1) Thank you for allowing us the opportunity to read the draft EIS, and to submit comments on proposed alternatives considered by the USFS for The Divide Travel Plan. Sincerely, William and Judy Carrigan 7500 Priest Pass Road Helena, MT 59601	
(106) From: Jerry DiMarco <dimarco@physics.montana.edu> Sent: Wednesday, June 11, 2014 4:28 PM To: FS-comments-northern-helena Subject: Divide Travel Plan Regarding the Divide Travel Plan, I support Alternative 3 with some modifications as noted below. My understanding is that Alternative 3 is based on an actual agreement between user groups, which should carry some weight. I believe it makes the most sense to protect the wildlands along the Continental Divide Trail from development and motorized use. Specifically, I hope the Continental Divide Trail corridor near Nevada Mountain, the corridor between Bison Mountain and the headwaters of Ontario Creek, and the corridor from MacDonald to Mullan Pass can all be designated as non-motorized year-round. In addition, it makes sense to extend the non-motorized area to all Little Blackfoot Roadless Lands, and down to the rehabilitated areas near Sweeney Creek. Given the heavy use the area has seen, I hope more areas can be rehabilitated.(106-1)	(106-1) Thank you for your comment.

Comments	Response to Comments
Much of the Continental Divide has been heavily roaded and abused due to mining and timber activities. In an overcrowded world where we are altering not only the planet, but the climate that gave rise to all life, does it make sense to further expand our impact? I think instead we should be looking for ways to minimize our impact. It makes the most sense on our public lands to restrict the most damaging uses to the periphery. Only the least damaging, low impact uses should be granted access to the interior or the most sensitive areas of our public lands. I hope you will consider these issues as well. Thank you… Jerry DiMarco	
(107) June 11, 2014 Transcribed from Comment Sheet Comments are for Amendment Gene Grandy PO Box 32 Ellison, MT 59728 Prefer Alternative #1 – Existing Note: 227-C1 Hat Creek Road is listed as open to Snowmobile travel on maps. Road is private with no access to public. There are locks on 2 gates. Grandys & Senecal Ranch. (107-1) Thanks Gene Grandy	(107-1) Thank you for your input.
(108) From: Janet Grinde <janetgrinde@hotmail.com>	

Comments	Response to Comments
Sent: Wednesday, June 11, 2014 9:04 PM To: FS-comments-northern-helena Subject: Divide Travel Plan District Ranger DeGeest, I support Alternative #3. I want to see the Nevada Mountain wildlands along the Continental Divide Scenic Trail protected. I have hiked that area and it is outstanding. I also support protection of all Little Blackfoot roadless lands. Thank you for the opportunity to comment. (108-1) Janet Grinde 3485 Penny Lane Helena, MT 5902	(108-1) Thank you for your input.
(109) From: Dale Hearn <hbp3@comcast.net> Sent: Wednesday, June 11, 2014 9:46 AM To: FS-comments-northern-helena-helena Subject: Black Mountain Forest Service, Concerning the Continental Divide Travel Plan, I would like to add a comment in favor of alternative #4. (109-1) I've had the privilege of riding motorized vehicles in this area before. Because of the combination of my age and my medical condition, I would not be able to walk through this area without the assistance of a motorized vehicle. Option 4 at least gives me the option to enjoy this area with my grandchild in the winter, but it is very disappointing that I will not be able to enjoy this area in the summer months. Regards, Dale Hearn	(109-1) Thank you for your input.
(110)	(110-1) Thank you for your comments.

Comments	Response to Comments
From: Steven Hearn <stevenlyle82@gmail.com> Sent: Wednesday, June 11, 2014 10:25 AM To: FS-comments-northern-helena-helena Subject: Response to the closures For those who didn't know, the Forest Service is proposing changes to motorized vehicles that would affect Black Mountain. They have 4 alternative plans they are seeking comment on. Right now, Victory Mill, Cave Gulch, 3 Mile, the Divide trail over Black Mountain, etc. are closed to all motorized vehicles, including snowmobiles. Alternative 1 would keep all that in place. Alternatives 2 & 4 would at least open these areas to snowmobiles. There are no proposals that would allow 4 wheelers and motorcycles anywhere. The last day to comment is Thursday, June 12.The email address for commenting is: This is a response to the above closures, families have been riding back there for years upon years, for some being able to ride back there seems just like everyday life and for others it's an escape of everyday life, john muir stated that we must preserve the wilderness for our children and so forth, but we also must allow them to enjoy what we have worked to preserve. To allow preserving these areas is a great idea but to be able to raise awareness on preserving you must let the monthly warrior of the outdoors and their children to enjoy it also, you can't let them enjoy it by closing it off and saying only foot traffic from here on for the next 60,000 acres, let's face it we live in a society and day and age that use motorized vehicles whether it be cars, trucks or ORV's, maybe we should take a look at maintaining trails and limiting the amount of side trails instead of just closing them all, Thank you for your time, Steven Hearn Sent from my iPhone	
(111) June 11, 2014 Transcribed from hand written letter	

Comments	Response to Comments
Forest Service Comment Committee: I was stunned on my last hike in the Sweeney Creek area to see the extent of damage caused by thrill riders. Lying, as it does, close to a population center area included in the Divide Travel Plan must be monitored maintained and old sign of abuse erased. (111-1) It is in the bull's-eye for overuse and additional damage by those who don't value or understand natural systems and lack appreciation for public lands as a gift all Americans hold in common. Alternative 3 seems to come closest to addressing concerns we have for the resource's protection; Its habitat wildlife, timber, soil and water. (111-2) Pat and Curt Helvey	(111-1) Sweeny Creek is designated as a non-motorized area in Alternative 5. (111-2) Thank you for your comment.
(112) From – drhemion@gmail.com To – FS-comments-northern-helena Subject - Protect the Continental Divide Trail Sent: Wed 6/11/2014 8:55 P< Ranger Heather DeGeest: Please adopt Alternative #3 and the Continental Divide Trail corridor protections. I support the non-motorized management of wildlands in the Nevada Mountain and Little Blackfoot headwaters, as proposed by the Montana Wilderness Association. (112-1) Sincerely David Hemion	(112-1)Thank you for your comment.

Comments	Response to Comments
3 Burnt Mountain Montana City, MT 59634	
(113) June 11, 2014 Heather DeGeest Helena National Forest Attn: Divide Travel Plan 2880 Skyway Drive Helena, MT 59602 Dear Ms. DeGeest: I am writing to submit additional personal comments on the Divide Travel Plan Draft Environmental Impact Statement. These comments are supplemental to comments previously submitted by myself and other authors on behalf of the Helena Hunters and Anglers Association (HHAA), of which I am a board member, and by the Western Environmental Law Center on behalf of HHAA. I would also like to endorse the comments submitted by the Montana High Divide Trails Partnership, as I also contributed to their development. By way of introduction, I am a third generation Helena native with 50 years of recreational experience on the Helena National Forest. I am a natural resource scientist/biologist with 37 years of experience in the field of watershed management and water quality. I have been intimately involved as a citizen advocate/activist in forest conservation since at least 1980. My grandparents lived in Marysville until the early 1930s and they and my father introduced me to the Divide Travel Planning Area at an early age. I am knowledgeable about the Continental Divide corridor throughout the Divide TPA and am especially familiar with the Nevada Mountain Inventoried Roadless Area. My comments focus on three primary areas, as follows:	

Comments	Response to Comments
1. Nevada Mountain Roadless Area Management 2. Greater Continental Divide Corridor Management 3. Sweeney Creek Area Management Please note that I am not addressing the proposed amendment to the big game security standard in these comments. HHAA and Western Environmental Law Center, on behalf of HHAA, have submitted detailed comments on that proposal of which I was a co-author. I am endorsing those comments and I encourage your careful consideration of our input and suggestions. I realize the proposed amendment may be a work in progress subject to modifications, and that some of us will be meeting with you and Denise Pengeroth on or about June 23 to continue these discussions. (113-1) Nevada Mountain Roadless Area Management As you know, the 56,800-acre Nevada Mountain Roadless Area (NMRA) is the largest remaining unprotected roadless area on the Helena National Forest (HNF). The area includes 8,293-foot Nevada Mountain, and 8,338-foot Black Mountain, the two highest peaks along the Continental Divide from Caribou Peak in the Scapegoat Wilderness south to Thunderbolt Mountain. The area is important for a number of reasons. Winter snowpack accumulations along 15 miles of the Continental Divide and adjacent ridges within the heart of the NMRA annually recharge the watersheds of Little Prickly Pear Creek, Nevada Creek, Poorman Creek, and Threemile Creek. This consistent water supply is critical for irrigated agriculture and hydropower production, and sustains blue ribbon fisheries in the Blackfoot and Missouri rivers. The Nevada Mountain Roadless Area is high quality habitat for more than a few sensitive species, including wolverine, lynx, grizzly bear, gray wolf, and bull trout (the latter in upper Nevada Creek and Poorman Creek). Much more importantly, this undeveloped segment of the Continental Divide serves as a wildlife migratory corridor between the Northern Rockies and Greater Yellowstone Ecosystems	(113-1) The Wildlife Background Report (p. 278-282) discusses wildlife and travel management in the Black Mountain/upper Ophir Creek/Meyers Hill country, which lies adjacent to the Nevada Mountain Roadless Area within the Divide the Travel Plan Area. In particular, we recognize the area around Black Mountain as a key wildlife area, intimately connected to the Nevada Mountain Roadless Area and to the motorized area closure in the upper reaches of the Little Prickly Pear watershed to the northeast. All action alternatives reduce motorized presence in this area. This discussion is also included in an equivalent section in the FEIS.

Comments	Response to Comments
allowing the transfer of genetic material between increasingly isolated and fragmented wildlife populations. In the summer, fall, and spring, the area provides important habitat and security cover for elk. It is also home to black bears, mule deer, whitetail deer, a growing population of Shiras moose, mountain lions, and grouse, as well as numerous non-game species. (113-1) The area has been popular for big game hunters for millennia. While traversing a game trail in the area a few years ago, a good friend of mine looked down to spot an 8,000 year old three-inch long Paleo Indian atlatl point. Based on archaeological evidence, human hunters have pursued elk and deer in the Nevada Mountain country for at least the last 9,000 years. From a personal perspective, Nevada Mountain has provided the highest quality recreational opportunities to four generations of my family. My wife and I raised our family on its elk and deer. My son and I sat entranced for more than an hour one fall day as we watched a grizzly foraging at the base of a talus slope below us (one of several personal grizzly sightings in this area). One early morning, I watched a wolverine ghost out of the fog to cross in plain view mere yards ahead of me as I ascended a ridgeline. I have personally seen wolverines in Nevada Mountain on three occasions, and recent research by Steve Gehman of Wild Things Unlimited has documented this area as a wolverine “hotspot” because of its high wolverine densities. It is also documented critical lynx habitat. On another occasion, a friend and I were stalked by a cougar to within seven yards before the big cat realized his error and retreated. More recently, I harvested a beautiful gray wolf on the flank of Nevada Mountain to claim my first predator in more than 45 years of hunting in this area. Time spent in the NMRA has created my fondest memories and continually enriches my soul. To me personally, the area is irreplaceable and it is my spiritual foundation. The future of Nevada Mountain was not always secure. Condition of the area trended downward through the 1970s with illegal road construction associated with mining exploration and other insults. The area as we know it was nearly lost in the	

Comments	Response to Comments
early 1980s when road development into its core and major timber sales were proposed by the Helena National Forest. We sportsmen rallied for protection and the proposals were withdrawn. Groups included the Nevada Creek Concerned Sportsmen, Helena Forest Conservation Coalition, Montana Wilderness Association, and many individual citizens. I have files documenting this era and the extensive collective input and support for protection of the area. Organized citizen involvement during development of the Helena National Forest Plan from 1982-1986 lead by the Helena Forest Conservation Coalition resulted in designation of a roadless non-motorized core area, with primarily wildlife emphasis management prescriptions for the remainder of the area. Since 1986, additional roads have been closed and a greater portion of the area has been designated for non-motorized uses. The NMRA has been included in several past Wilderness bills before Congress and many of us testified in support of Wilderness designation at the hearings. The 2005 Divide-Lincoln Winter Recreation Agreement and the 2009 Montana High Divide Trails Agreement have added further protections for the area and have unified many of the user groups with a consensus vision for management. The Divide Travel Plan EIS provides us with an important opportunity to further secure the status of the Nevada Mountain Roadless Area and its many values, and to safeguard this 30 year conservation success story. Alternative 3 within the DEIS is consistent with the winter recreation agreement boundaries and is the only alternative that honors this agreement which has been signed by the Helena National Forest and many user groups. Alternative 3 also preserves Wilderness designation as a future option, which will be reviewed as a component of the 2014-2018 Helena Forest Plan revision process. One can make the argument that the NMRA provides the very best remaining habitat and habitat connectivity along the Continental Divide within the Helena National Forest for sensitive and listed wildlife species. Its importance grows every year (for wildlife and human recreation), and the researchers are just now beginning to document how critically important this area is. Fortunately, we are learning this before it’s too late to make good management decisions.	(113-2) Thank you for your input.

Comments	Response to Comments
Please adopt Alternative 3 as a core component and consider expanding protections for the Nevada Mountain Roadless Area through additional motorized closures along its perimeter area. For example, none of the current alternatives adequately address massive road duplication to the south of the NMRA. These roads inhibit linkage between the Nevada Mountain Roadless Area along the Continental Divide to and south of Highway 12, thus hindering movement of wildlife between ecosystems. Simply stated, no other roadless area within the Divide Travel Planning Area warrants more special attention and protection than Nevada Mountain. (113-2)	(113-3) Thank you for your input. Alternative 5 designates sections for the CDNST as non-motorized in areas where adjacent motorized routes exist.
Greater Continental Divide Corridor Management	
Only 20 miles of 75 miles of the Continental Divide Trail would be managed as non-motorized under the most protective Alternative 3. This should be reconsidered, and the HNF should strive for consistency with the 2009 Continental Divide National Comprehensive Plan. (113-3)	(113-4) Thank you for your input.
Please enhance protection of the Continental Divide corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year around protection to all Little Blackfoot Roadless Area lands. Please look for opportunities to expand year around non-motorized area protection to the Continental Divide corridor from MacDonald Pass-Priest Pass to Mullan Pass. Alternative 3 best addresses these requests but can be improved upon. HHAA provided specific recommendations and supporting rationale for travel management within these areas and I urge you to strongly consider that information. (113-4)	
Sweeney Creek Area Management	
The Sweeny Creek area provides over 7,000 acres of high quality wildlife habitat that extends to the east from the Continental Divide. This area contains important elk calving and summer range, and security cover during the big game season. In the cold months the south facing slopes of Sweeny provide winter forage for mule deer, elk and moose. Sweeny Creek provides important big game security along a part of	(113-5) Refer to Alternative 5.

Comments	Response to Comments
the Divide Landscape that is otherwise heavily fragmented by roads. This area has always been recognized as important mule deer winter range. The numerous motorized routes in Sweeny Creek are all illegal user-created routes. No NEPA evaluation has been done on any of these routes. They need to be physically closed, reseeded and fully reclaimed. The cluster of illegal spur roads emanating from the Priest Pass Road must be physically closed and reclaimed. A number of these spur roads cross live streams or are located in wet aspen/dogwood riparian habitat. Uncontrolled firewood cutting is starting to impact the aspen stands along the Priest Pass road. (113-5) Both Alternatives 3 and 4 would finally close this area to wheeled motorized vehicles and also recognize it as a winter area closure. This move is strongly encouraged, and if implemented would finally accommodate the requests of MFWP that were made in 1991 to create a motorized area closure for Sweeney Creek to protect critical mule deer, elk, and moose winter range, as well as limited old growth ponderosa pine habitat for sensitive species. Recognition of a year-long area closure is due and appreciated. However, none of the alternatives closes Road 1802-B2 to over-snow motorized travel, yet this road accesses the non-motorized winter area and the Continental Divide linkage zone in this immediate area is known to be used by lynx, wolverine, and wolves. Please consider an alternative that will close Road 1802-B2 to snowmobile use. (113-6) In conclusion, I thank you for the opportunity to submit these additional comments. I am confident that you will utilize all the extensive input you're receiving to finalize the EIS and to develop an improved preferred alternative. I personally look forward to working with you to complete the Divide travel planning process and to implement and monitor the new travel plan. Thanks, again, Heather! Sincerely, Gary lngman 1110 8th Avenue	(113-6) Thank you for your comment. The Forest Service looked at the transportation system as a whole within the entire Divide Landscape to determine through public participation and analysis what roads were appropriate to be designated open or seasonally open to wheeled and over-snow motorized vehicle. Roads that would potentially have an effect on resources were considered for yearlong closures. This Final Environmental Impact Statement discloses analysis findings which were considered when determining a manageable system of designated public motorized access routes and areas within the Divide area which are displayed in the Draft Record of Decision and associated appendices.

Comments	Response to Comments
Helena, MT 59601	
(114) From: Eloise Kendy <ekendy@bresnan.net> Sent: Wednesday, June 11, 2014 8:57 PM To: FS-comments-northern-helena Subject: Divide Travel Plan Dear Ranger DeGeest, I urge you to fully protect the Continental Divide Trail and surrounding wild lands by adopting the Continental Divide Trail corridor protections in Alternative #3. As the only alternative in accordance with the Lincoln-North Divide winter agreement endorsed by the Montana Snowmobile Association, Montana FWP, and the Montana Wilderness Association, Alternative #3 protects Nevada Mountain's diverse wildlife species – more species than any other place in your District – all year round. (114-1) Additionally, Alternative #3 extends year-round quiet to roadless areas from Bison Creek to Upper Ontario Creek, along the Continental Divide National Scenic Trail, only 20 miles of which would be non-motorized. In my mind, non-motorized equates to scenic, the trail's namesake. Thank you for repairing vehicle-damaged Sweeney Creek. (114-2) Best regards, Eloise Kendy 415 Monroe Avenue Helena, MT 59601	(114-1) The Nevada Mountain IRA was left intact; the snowmobile area restriction was modified based on an enforceable boundary. (114-2) Refer to Alternative 5.
(115) From: Ted Koon <Edward.Koon@Halliburton.com> Sent: Wednesday, June 11, 2014 8:37 AM To: FS-comments-northern-helena-helena	(115-1) Thank you for your input.

Comments	Response to Comments
Subject: Continental Divide Travel Plan #24091 With regards to the Continental Divide Travel Plan, these changes are not only a major disappointment, but they are just plain sad. The technology behind wheeled motorized vehicles gives many people access to some of Montana's most beautiful scenery that they normally would not be capable of visiting due to age or health restrictions. Taxes are paid by all and to restrict access to this land with a blanket policy is not fair. It's sad to think that some people will lose access to this land for perhaps the rest of their life… I would like to add a comment in favor of alternative #4, as it is the lesser of 4 evils… Regards, Ted Edward (Ted) Koon Global Technical Advisor MRIL/OH Nuclear Halliburton Wireline and Perforating 3000 N Sam Houston Pkwy E Houston, TX 77032 Office: 281-871-3076 Cell: 832-490-6063	
(116) From: Ken and Eileen Salo <ksalo245@msn.com> Sent: Wednesday, June 11, 2014 9:01 PM To: FS-comments-northern-helena-helena Subject: CTVA Comments for the Divide Travel Plan 6 10 2014 Attachments: CTVA Divide Travel Plan Comments 6 10 2014.pdf We have assembled the following information and issues from our members and	

Comments	Response to Comments
other motorized recreationists for the project record. These are new comments. We appreciate the opportunity to provide our comments for the Divide Travel Plan. Thank you for your consideration of our comments. Sincerely, /s/ Action Committee on behalf of our 136 members and their families Capital Trail Vehicle Association (CTVA)[1] P.O. Box 5295 Helena, MT 59604-5295 CTVA_Action@q.com Contacts: Don Gordon at (406) 458-9577 DGordon315@aol.com Ken Salo at (406) 443-5559 ksalo245@msn.com George Wirt at (406) 227-6037 G_wirt@msn.com CC: Dave Koch, President CTVA [1] CTVA is also a member of Montana Trail Vehicle Riders Association (mtvra.com), Blue Ribbon Coalition (sharetrails.org), and New Mexico Off highway Vehicle Alliance (nmohva.org). Individual memberships in the American Motorcycle Association (amacycle.org), Citizens for Balanced Use (citizensforbalanceduse.com), Families for Outdoor Recreation (ffor.org), Montana 4X4 Association, Inc. (m4x4a.org), Montana Multiple Use Association (montanamua.org), Snowmobile Alliance of Western States (snowmobile-alliance.org), Treasure State Alliance, and United Four Wheel Drive Association (ufwda.org) CAPITAL TRAIL VEHICLE ASSOCIATION (CTVA) P.O. Box 5295 Helena, MT 59604-5295 June 10, 2014 Helena National Forest ATTN: Divide Travel Plan 2880 Skyway Drive	

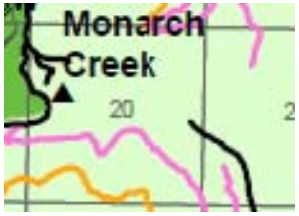
Comments	Response to Comments
Helena, MT 59602 comments-northern-helena-helena@fs.fed.us Re: Comments for the Divide Travel Plan Dear Sir/Madam, We have assembled the following information and issues from our members and other motorized recreationists for the project record. We appreciate the opportunity to provide our comments for the Divide Travel Plan. Thank you for your consideration of our comments. Sincerely, /s/ Action Committee on behalf of our 136 members and their families Capital Trail Vehicle Association (CTVA)1 P.O. Box 5295 Helena, MT 59604-5295 CTVA_Action@q.com Contacts: Don Gordon at (406) 458-9577 DGordon315@aol.com Ken Salo at (406) 443-5559 ksalo245@msn.com George Wirt at (406) 227-6037 G_wirt@msn.com CC: Dave Koch, President CTVA 1 CTVA is also a member of Montana Trail Vehicle Riders Association (mtvra.com), Blue Ribbon Coalition (sharetrails.org), and New Mexico Off highway Vehicle Alliance (nmohva.org). Individual memberships in the American Motorcycle Association (ama-cycle.org), Citizens for Balanced Use (citizensforbalanceduse.com), Families for Outdoor Recreation (ffor.org), Montana	

Comments	Response to Comments
4X4 Association, Inc. (m4x4a.org), Montana Multiple Use Association (montanamua.org), Snowmobile Alliance of Western States (snowmobile-alliance.org), Treasure State Alliance, and United Four Wheel Drive Association (ufwda.org) We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 1 of 23 ISSUES WITH THE PROPOSED ALTERNATIVE 2 We support enhancements to Alternative 2 so that it becomes a reasonable Pro-Recreation Alternative for the following specific reasons which are supported by our comments in this submittal and further supported by all of our comment submittals listed at the end of this document. (116-1) We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. We are practical environmentalists who sponsor weed control projects, and do trail maintenance including clearing trails and building bridges and water bars for use by all. We sponsor education projects including construction of kiosks and signage. The public has a great need for motorized trails. Human ecology specific to the benefits and need for OHV recreation deserves more consideration in the analysis and preferred alternative. Under existing conditions there are considerably more non-motorized trail opportunities than motorized trail opportunities in the Helena National Forest. OHVs are growing in popularity (see registration trends). Additional routes are needed to address future motorized growth. The public needs more motorized trail opportunities and not less. (116-2) The Forest Service has proposed less motorized trail opportunities. Motorized recreationists are the only ones to lose in this proposal. Non-Motorized trails are significantly increased (50%) by the proposed alternative. The exact number is not easy to determine in the DEIS. (116-3)	(116-1) Thank you for your input.

Comments	Response to Comments
OHV recreationists need an adequate trail system for all of the same reasons that non-motorized recreationists need a system. The percentage and miles of non-motorized versus motorized trails does not adequately consider the total miles of non-motorized trails in the entire Helena National Forest including the miles of non-motorized trails in nearby wilderness areas. (116-4) Motorized recreationists are the only one to lose in every travel plan action. The National OHV policy was not intended to be a massive motorized closure process but that is how it is being used. We are extremely concerned that the claimed benefits to the natural environmental are not all that real and come at a significant cost to the human ecology which is very real. 13. Impacts from beetle-kill and fires are acceptable and are far more significant than OHV recreation. We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 2 of 23 14. CEQ guidance requires the NEPA process to provide adequate consideration of significant issues such as those provide in CTVA's comments. Motorize closures and lack of adequate motorized access and recreational opportunities are a significant issue. The draft EIS does not adequately address or mitigate these significant issues. Using the NEPA process per CEQ will support the development of a Pro-Recreation Alternative as required to address significant issues. (116-5) 15. We are extremely concerned that the process is predisposed to implement a top-down management directive to eliminate or minimize motorized recreation and is doing so by inadequately addressing the significant issues associated with the public need for motorized access and recreation.	(116-2) Thank you for your input. (116-3) Thank you for your comments. As expected, the public comments on this project expressed the full range of opinions regarding motorized use. We heard from many people who would prefer more motorized opportunities, as well as those who would prefer more non-motorized opportunities. Both points of view were considered in meeting the Purpose and Need to better manage natural resources, improve recreation management in regard to motorized recreation and decrease user conflicts. The IDT analyzed the effects of each alternative utilizing the best available scientific information and following laws, policies, and procedures that are in place. These analyses are summarized in the EIS. The final decision will include future management direction that will also comply with laws, policies, manual direction, and procedures that apply. Information regarding elk security is in the wildlife section of the EIS, and the recreation analysis identifies the effects of each alternative on motorized and non-motorized opportunities and cumulative effects. (116-4) Thank you for your input. The Divide Travel Recreation Report considered past, present, and reasonably foreseeable projects that would potentially have an effect on the travel management status in areas outside the Divide analysis area. This is discussed in the cumulative effects section of the Recreation Report. Though trails in wilderness areas are not discussed, the Recreation Report adequately addresses other decisions and potential decisions that could potentially effect the travel management status on travel routes outside the Divide

Comments	Response to Comments
16. The Divide Travel Plan process has been ongoing for 8 to 10 years. It is difficult for us to stay current with this process given this duration. Additionally, the Blackfoot Travel Plan has come out with an almost concurrent review and objection period. We greatly appreciate the extension of the comment period so that we can reasonably respond given the concurrent schedules and the complexities of these documents. 17. We are concerned that the Forest Service will be in a very contentious position with the public when you try to enforce a travel plan that is not in touch with the public's need for motorized access and motorized recreation in the Helena National Forest. We would rather help you develop and implement a Pro-Recreation plan that will reap wide-spread public support. 18. We are concerned about the significant cost of the road decommissioning project versus the use of those funds for maintenance of motorized routes. A better return on the funding in both environmental enhancement and recreational opportunities would be realized by investing the same funding in maintenance of motorized routes. Questions that need to be adequately addressed include: a. For how many years can motorized routes be maintained for public use and benefit versus the cost of decommissioning them? (116-6) b. How much more environmental enhancement could be realized by using the same funding for maintenance of motorized routes including water bars. The Stream Systems Technology Center found that installing water bars at a reasonable spacing was a very effective way to reduce the sediment discharge from trails and roads (July 2007 Stream Notes at http://www.stream.fs.fed.us). Many other best management practices are available to control sediment production at demonstrated by the bibliography at http://www.fs.fed.us/t-d/programs/wsa/pdfPubs/road_bmp.pdf . 19. Lack of funding was used as a reason in the EIS to close motorized routes. Now the agency is able to readily find funding to decommission motorized routes. This inconsistency greatly concerns motorized recreationists and we encourage the	area. (116-5) As described in more detail in the EIS, we did consider an 'equal sharing' or pro-recreation alternative. Alternatives 2, 3 and 4 as described in the EIS are the IDT's best attempt at providing a full range of recreation options while balancing recreation and resource protection needs. Alternative 5 was developed based on public input and does address these suggestions.

Comments	Response to Comments
agency to give the pursuit of maintenance funding a higher priority than the pursuit of decommissioning funding. Environmental justice and socio-economic issues associated with this inconsistency must be adequately addressed. We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 3 of 23 The alternative maps use a format that is not familiar to the public. The public has used for decades and is familiar with the traditional Helena National Forest map which has enough features so that the public can locate themselves. In the interest of adequate public disclosure, we request that the alternative maps be shown using the forest map as the base. (116-7) Because of the lack of detail on the alternatives map and because it is not the familiar traditional Helena National Forest map, the public will have a difficult time distinguishing routes and provide adequate comments on the route proposal. The map format requiring the public to look at both the existing conditions map and the alternative map to determine if a particular route is open or closed is extremely confusing and difficult to interpret. Because of the confusing process of looking at two maps, we cannot distinguish routes and provide adequate comments on the alternatives. We request that the alternative maps be modified so that each one stands on each own with respect to whether each route shown is open or closed. (116-8) The map format which showing both summer and winter route designations is extremely difficult and confusing to interpret. Because of the confusing process of looking at two travel plans on one set of maps, we cannot distinguish routes and provide adequate comments on either the summer or winter route proposal. We request that the alternative maps be modified so that there is an alternative map for each one stands on each own with respect to whether each route shown is open or closed. (116-9)	(116-6) With a decision on the travel plan and the inclusion of a motorized trail system, the Helena NF will work together with motorized trail organizations that have already joined us in partnership in the future management, maintenance, and education of this system. The respective costs of road/trail maintenance and decommissioning are described in the economics section of the EIS.

Comments	Response to Comments
All alternative maps must include route numbers for every existing route so that the, the public has a reasonable way to comment on a route. The Alternative 1 map does not include any route numbers. The other maps do not include all of the route numbers. This lack of information makes it extremely difficult to comment on individual routes. Routes are shown as lines on paper and the maps include very few features from which one can locate a route. Public understanding of the proposed alternatives would be greatly improved by implementing a mapping tool similar to the one developed by Idaho Parks and Recreation. This tool can be tried out at http://www.trails.idaho.gov/trails/ . Zoom in and click on a particular trail to see the information provided for each route. Earlier versions of this tool included GPS downloads for each route which would help assure that the public was on the right trail. This tool would also be useful after the analysis and decision to inform the public of the route designations. (116-10)	(116-7) Thank you for your input. We will consider you comment in determining the format for maps used to display the alternatives in the FEIS.
Ontario Creek ATV trail is not shown correctly on the existing conditions map. This route is currently open and is used by many OHVs. (116-11)  	(116-8) Thank you for your input.
We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 4 of 23	
27. The proposed 20 miles of OHV routes in the project area covering 155,000 acres of multiple-use land: a. Most of the routes are squeezed into the Sweeny Creek area. Overall, the proposed action not meet the needs of the public for adequate multiple-use access and recreational opportunity across the entire project area,	(116-9) Thank you for your input.

Comments	Response to Comments
b. Is not a reasonable level of use for multiple-use lands and c. Does not meet the requirements of existing multiple-use laws. (116-12)	(116-10) Thank you for your input.
The project scoping was conducted in 2008. Six years have gone by which creates two deficiencies. First, since 2008 motorized recreationists have suffered significant cumulative impacts from closures in the Helena National Forest and surrounding forests and BLM lands including the Gallatin National Forest travel plan, Lewis and Clark National Forest travel plan, Beaverhead Deerlodge Forest Plan and BLM Butte District Resource Management Plan which included the closure of the Scratch Gravel Hills to all motorized access. These and other significant actions have produced significant impacts on motorized access and recreational which render the 2008 scoping out of date and require a re-opening of the scoping process. Secondly, the public cannot be expected to remain engaged in the travel planning process over the course of six years. Many motorized recreationists have become frustrated with the length of time that has transpired and have given up on the travel planning process. The Forest Service must come up with an adequate adjustment to the process to adequately restore the involvement of motorized recreationists. The proposed plan continues to provide non-motorized recreationists with more opportunities at the expense of motorized recreationists even though non-motorized recreationists are a minority user on the existing routes. Most of the public including motorized recreationists expect a “travel plan” to adequately look out for their needs, culture and traditions for motorized access and recreation in the forest. These values are extremely important to us because our culture and traditions of access and use of public lands go back decades and generations to our pioneer forefathers. These values should not be easily dismissed. A Pro-Recreation Alternative would meet these expectations. We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 5 of 23	(116-11) Thank you for your input. We believe you are referring to FR 4104-1 on the south side of Ontario Creek. Under the existing condition this road is in fact closed to all wheeled motorized use year-round.

Comments	Response to Comments
Alternative summary in miles: Miles of road open: Alternative 1 – No Action: 286; Alternative 2: 284; Alternative 3: 262; Alternative 4: 265 Miles of road closed: Alternative 1 – No Action: 0; Alternative 2: 2; Alternative 3: 24; Alternative 4: 21 Miles of motorized ATV trail: Alternative 1 – No Action: 19; Alternative 2: 26; Alternative 3: 0; Alternative 4: 4 Miles of single-track motorized trail: Alternative 1 – No Action: 0; Alternative 2: 0; Alternative 3: 0; Alternative 4: 0 CDNST open to motorized vehicles: Alternative 1 – No Action: 24.6; Alternative 2: 20.6; Alternative 3: 22.5; Alternative 4: 21.9 New CDNST motorized closures: Alternative 1 – No Action: 0; Alternative 2: 4; Alternative 3: 2.1; Alternative 4: 2.70 Miles of Non-Motorized Trail: Alternative 1 – No Action: 39.3; Alternative 2: 47.3; Alternative 3: 65.3; Alternative 4: 64.0 OHV recreationists need an adequate trail system close to town for all of the same reasons that non-motorized recreationists need a system such as the Mount Helena and Mount Ascension trails system as shown at http://helenamontanamaps.org/trails/. The expanded Sweeny Creek area is a reasonable place to provide the same opportunity for OHV recreationists in the Helena area. (116-13) OHV recreationists are still looking for a replacement opportunity following the complete closure of the Scratch Gravel Hills to motorized use. The support for an OHV opportunity close to Helena is significant as we have over 400 signatures expressing support for the Scratch Gravel Hills (copy available upon request). (116-14)	(116-12) Thank you for you input. The proposed action (alternative 2) is not preferred alternative. The preferred alternative is alternative 5 modified which works towards striking a balance between motorized and non-motorized forest user while minimizing impacts to the resources.

Comments	Response to Comments
The analysis in the DEIS assumes that OHV trail impacts are equal to those associated with roads. We do not believe that this is the case based on our knowledge and observations which include the fact that OHV trails are less in width, no trees are removed (minimal disturbance of wildlife habitat), and very little or no cut and fill is required to construct them. (116-15) The project scoping was conducted in 2008. Six years have gone by. Since 2008 motorized recreationists have suffered significant cumulative impacts from closures in the Helena National Forest and surrounding forests and BLM lands. We feel that this condition should be factored into the evaluation. It is also asking a lot for the public to remain involved in a process that has gone on for 8 years. We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 6 of 23 37. Past timber sales at Bison Mountain and Treasure Mountain included significant motorized closures to accommodate elk cover requirements. Now these areas have re-forested and it would be reasonable to re-open these areas to OHV routes. 38. Elk Cover Requirements. Elk do well in places like Nevada without trees. Additionally, elk were originally animals that lived on the plains and survived just fine without trees. Effective elk hiding is provided by mountains, hills, ravines, ridges, rocks, brush. These land factors must be incorporated into the elk hiding cover equation. (116-16) 39. Additionally, wolves have radically changed elk behavior and use of tree canopy. Elk now avoid tree cover because the cover allows wolves to prey upon them easier. Elk now prefer open areas where they can “keep an eye” on the wolves and defend themselves. Therefore, tree cover is not a significant benefit to elk at this time and this changed condition must be recognized. (116-18) 40. Research and documents including the following clearly demonstrate that OHV	

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recreation has no more impact on wildlife than other forms of recreation and is in fact less in many cases (references available upon request): a. Chapter 6, Ungulates, Effects Of Recreation On Rocky Mountain Wildlife, A Review For Montana, 1999. (116-19) b. A Partial Literature Review Of The Effects Of Various Human Activities On Wildlife, Compiled By Nora Hamilton, Bureau Of Land Management, National Technical Assistant For Trails, September, 1997. c. Ward, Lorin A., Jerry J. Cupal, "Telemetered Heart Rate of Three Elk as Affected by Activity and Human Disturbance", Planning for Trailbike Recreation, US Department of the Interior Heritage, Conservation and Recreation Service, 1976. (116-20) 41. The impact of OHV recreation on wildlife has been overstated by the agency and wildlife biologists. First, wildlife populations are at all-time high (116-21a) (http://www.mtstandard.com/articles/2005/11/30/outdoors/hjjeiigjjcefjb.txt, http://fwp.mt.gov/FwpPaperApps/hunting/ElkPlanFinal.pdf) at the same time when OHV use is increasing. If there is any impact to be identified, it appears that it should be that the positive impact associated with increasing OHV use and increasing wildlife populations. Secondly, OHV use does not kill wildlife. Wildlife coexists just fine with OHVs. This was recently confirmed again by a study in Yellowstone Park which found that "Most elk, bison and trumpeter swans barely reacted last winter to the presence of snow coaches and snowmobiles in Yellowstone National Park, according to a study released Tuesday. Scientists watched more than 2,100 interactions between over-snow vehicles and wildlife last year to try to determine how they responded. Of those, 81 percent of the animals had no apparent response or they looked and then resumed what they were doing, the study said" (116-20b) (http://www.helenair.com/articles/2005/12/14/montana/a10121405_04.prt and http://www.nps.gov/yell/parkmgmt/upload/winterrec05.pdf).	(116-13) Thank you for you input. (116-14) Thank you for your input. The Scratch Gravel Hills are not located within the Divide Travel Plan project boundary and therefore are out of the scope of the planning for the divide area. (116-15) As discussed in the Hydrology Specialist Report,

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42. The disturbance of wildlife by OHV issue including wildlife corridors is being exaggerated to further the conversion of multiple-use lands to non-motorized lands. The agency is encouraged to avoid road and trail closures based on wildlife concerns except where negative wildlife impact can be specifically identified and documented. Motorized use on existing trails has little or no verified effect on game animal welfare. (116-20c) In fact, areas that have been more intensely visited We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 7 of 23 by motorized visitors have experienced significant increases in wildlife populations; further substantiating the fact that motorized recreation does not create a significant impact on wildlife. 43. Wildlife managers need to change their attitudes about summer motorized recreation and elk populations and admit that the two are compatible. Managers are seeing the need for a shift in thinking (http://www.helenair.com/articles/2009/04/26/state/top/55st_090426_elk.txt). Elk populations are healthy. The wants and needs more motorized access and recreation. There is no plausible reason that multiple-use land cannot be managed for a better balance of motorized access and recreation. (116-20d) 44. Hikers and wolves impact wildlife more than OHV use yet hikers and wolves are unrestricted. (116-21) 45. Some interests are pushing the wildlife corridor concept as a reason to close areas to motorized use. We have not seen adequate documentation or reasoning to justify this position and suspect that it is being used inappropriately as a reason to justify de facto wilderness by non-motorized interests. Significant issues must be answered before this concept can be given any credibility. Issues include: a. Why would wildlife follow physically challenging basin divides where food and water is scarce versus other corridors? They don't. This is easily verified by open	motorized trails can have effects on water quality similar to or greater than the impacts associated with engineered roads. These routes tend to lack the design features that mitigate sedimentation and are often located in settings that increase the potential to negatively impact water quality. (116-16) The Forest Plan amendment recognizes the role of topography and other non-vegetative cover (See the Forest Plan amendment, Background/Recent Science regarding Elk Management and The Concept of Elk Security Areas sections and the Alternative Description/Alternative B cover guidelines). (116-18) The Forest Plan amendment recognizes the effects of predation on elk habitat use and distribution (See the Forest Plan amendment at various locales). The amendment also recognizes that open road densities have been identified as the primary

Comments	Response to Comments
areas such as McDonald Pass or the jagged areas of the continental divide where we have never observed any significant number of wildlife crossings versus great numbers of wildlife crossings that we have observed in other areas that are more favored by wildlife. (116-22) b. There is no data or credible documentation that the continental divide or other basin divides are favored for wildlife migration. Especially theories that purport that wildlife will migrate from Mexico to Canada. This is counter to the types of habitat that different species require in order to survive. There is a significant lack of credible evidence to support the wildlife corridor hypothesis. (116-23) c. The lack of authorization or mandate from congress for this sort of designation and use of public land. d. The socio-economic issues associated with the attempt to use the wildlife corridor concept to convert multiple-use lands to defacto wilderness. 46. Unfortunately, the Alternative maps are confusing. The four Alternative Maps combine winter and summer routes on the same map. Then for each alternative they refer the reader back to the Alternative 1 Existing Conditions Map to determine the status of some routes. Therefore, the public cannot look at one map with all of the summer routes and one map for all of the winter routes for each alternative. The reader must look at two maps for each alternative and then "visualize" what a complete summer map and a complete winter map might look like. In other	affect to elk during the hunting season (See the Alternative Description/Alternative B/Discussion section). (116-19) Referenced in Forest Plan amendment. (116-20) Reviewed but not referenced in Forest Plan amendment; not applicable to amendment (116-21a) The effects of open roads on elk are well researched and documented. See the section 'Recent Science regarding Elk Management' in the Forest Plan amendment. (116-20b) To say that "wildlife populations" are at an all time high is an over-generalization. Elk population numbers are indeed at an all-time high in the Divide landscape: bull/cow ratios, however, which are a key measure as to the health of the populations, are inevitably low. Part of the reason elk numbers are so high in many areas is that they have been leaving motorized areas on the National Forest to find refuge on private lands where hunting is not allowed. The problem for elk in summer—as it is for a number of other species—is not risk of mortality, but simply being able to find enough productive habitat away from human disturbances (Wildlife Background Report, p. 48-49). Populations of some species are declining or hovering around levels that are well below what the habitat is capable of supporting, primarily because of the presence of humans on roads and trails. This certainly doesn't apply to a

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We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 8 of 23 words, the public cannot evaluate what the summer travel plan looks like without an extraordinary amount of visualization. Some existing routes are missing including short spurs to historic mines sites. It does not appear that our inventory maps and OHV Mine Tour proposal provided in 2009 were addressed. There are a number of opportunities to convert roads to OHV routes and make loops with the addition of short connectors. These viable alternatives have not been analyzed. (116-24) Our site specific use data shows that 97% of the route users are motorized recreationists. (116-25) The 3-States OHV Record of Decision requires that they agency provide a site specific analysis for route including site specific wildlife studies demonstrating why the route should be closed, the value to motorized recreationists including recreation, culture, and traditions. Our culture and traditions of access and use of public lands go back decades and generations to our pioneer forefathers. These values should not be easily dismissed. We understand from comments made by Forest Service representatives attending our meeting on March 25, 2014 that these sorts of site specific studies have not been done. Alternatives 2, 3 and 4 provide respectively, 26, 0 and 4 miles of OHV routes in a project area covering 155,500 acres of multiple-use designated land. These are not reasonable levels of access and recreation for multiple-use lands and it is not in compliance with the requirements of that law. (116-26) The distribution of trails in the Helena National Forest is out of balance with more non-motorized trails. The total route opportunity available to non-motorized recreationists is 541 miles of exclusive non-motorized trails or 78.52% of all trails and the miles of cross-country opportunity is infinite. The total miles of trails open to motorized recreationists are less than 148 or 21.48% of all trails. The miles of	majority of species—most songbirds and small mammals, for example—but we need to keep roads and motor trails out of enough key habitat areas to allow the more sensitive wide-ranging animals to maintain viable populations on the landscape. (116-20c) Volumnous research indicates that motorized use of open roads and motor trails do indeed affect habitat use patterns and other behavior of animals such as deer, elk, moose, bears, mountain lions, and others (Wildlife Background Report, p. 32, 48-49, 51, 82-83, 158, 161, 184-187, 204) This is not to say that some of these animals don't use habitat near trails or use them as travelways. But regular motor use of these trails restricts use of areas around them to certain times of day (nighttime) or certain times of year. Many animals avoid them almost entirely. The objective is not curtail OHV use across the landscape, but to create a pattern of trails that allows certain wildlife species large blocks of habitat free from this kind of disturbance. (116-20d) The two are compatible up to a point. Travel Plan alternatives present a variety of ways to stike a balance between motorized recreation, non-motorized recreation, and the requirements of a wide variety of wildlife—not just elk. (116-21) The effects of open roads on elk are well researched and documented. See the section 'Recent Science regarding Elk Management' in the Forest Plan amendment. A couple recent studies have shown that hikers cause a greater increase in pulse

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motorized cross-country opportunity are zero. Existing motorized single-track trails total about 38 miles or less than 5% of all trail opportunity. The Divide project area is multiple-use land that should be used to address this imbalance by creating more motorized trails. The stated goal of the Forest Service is now to "Minimize" (Chapter 2, page 15) which is contrary to Multiple Use Law which allows reasonable use of public lands. Motorized recreationists need adequate opportunities to recreate with their family and friends. These alternatives do not provide adequate opportunities to meet those needs. The plan does not include any motorcycle single-track trail. The 3-State OHV ROD recognizes and requires analysis of motorcycle single-track trail as defined in the 3-State EIS including figure 2.2 and 2.7 in Chapter 2. This is a deficiency that can be addressed by the designating a combined mountain bike/motorcycle trail system. The level of use will not be a conflict and this reasonable alternative has worked well in many other places. Additionally, OHV visitors carry shovels and chainsaws and will help to maintain the trails and keep them open from beetle-killed downfall including mountain bike trails used by motorcycles. We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 9 of 23 Our members clear hundreds of trees from trails each year and donate hundreds of hours of labor and expenses. We have work logs which document this significant effort and they are available upon request. Our hard work needs to be acknowledged and we need to be given credit for this benefit to all visitors and the Forest Service.	rates to nearby elk/deer than do OHVs and motor bikes: hikers move relatively slowly through an area and are present for a longer time. However, on any given day, OHVs and motor bikes have been shown to disrupt wildlife over a much broader area: they make more noise and they cover a lot of territory. Wolves are wildlife; they are part of the system. Given the low numbers of wolves in the landscape and their tendency to frequent private lands, their effect on Forest ungulates has been minimal. (116-22) This issue is discussed in some detail in the Wildlife Background Report in sections on "Connectivity and Fragmentation" (p. 30-40, 138-146) and in sections addressing some species that make use of travel corridors and linkage habitat—elk, grizzly bears, wolverines, lynx. This discussion is also included in equivalent wildlife sections in the FEIS. (116-23) Our analysis considers the entire Divide landscape on the Helena NF to be part of a region-wide linkage zone. Most transient species will move through this area, (which varies in width from a few miles to 25 miles or more) focusing on habitats where they can forage, find cover, and avoid human contact. The area on either side of the Continental Divide proper tends to pick up a relatively high percentage of this use because of the numerous productive drainage-head habitats in those areas and their often isolated position relative to human activity at lower elevation. Animals moving through a linkage zone will generally seek the path of least resistence that provides them with the resources that they need. Numerous areas at low and mid elevation also meet these criterea, and so movement is obviously not confined to a narrow "corridor" along the Divide. Historic travel routes in the valleys and foothills, however, are now often occuped by human settlement, which makes them unpalatable for a number of species (though less so for others). Our objectives in travel management are to identify the key habitats (wet sites,

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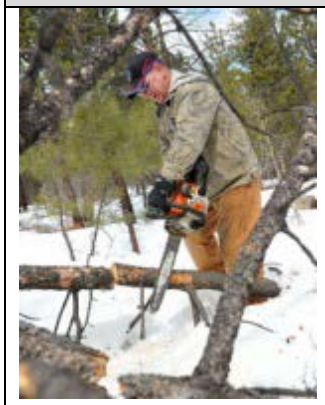 CTVA Member The Final Roadless Rule published on January 5, 2001 (http://roadless.fs.fed.us/documents/rule/roadless_fedreg_rule.pdf) specifically stated "The proposed rule did not close any roads or off-highway vehicle (OHV) trails". The agency must honor this commitment. This commitment was recently upheld as part of appeal Number 07-0510-0005 dated January 10, 2008 for the Smith River NRA travel management plan in the Six Rivers National Forest filed by Blue Ribbon Coalition (http://www.sharetrails.org/releases/media/?story=556 and www.sharetrails.org/files/SmithRiverNraBrcAppealDecisionJan14.pdf). Therefore, all (100%) of the remaining public lands including roadless areas must be managed for multiple-uses in order to avoid further contributing to the excessive allocation of resources and recreation opportunities for exclusive non-motorized use.	foraging areas, cover, etc.) and to prevent motorized use from making movement between them difficult. The data for this effort has come from decades of wildlife field work by the Helena NF, as well as numerous observations supplied by biologists and other field-going personnel from Montana FWP, U.S. Fish and Widllife Service, and BLM biologists. Numerous members of the public have also reported observations. (116-24) This has been done in Alternative 5 (116-25) Thank you for your comment. It is highly likely that the primary use on motor use will be motor vehicles. Most hikers prefer to use trails where they are unlikely to consistently encounter OHVs and motor bikes. (116-26) The purpose of this analysis is to determine the motorized and non-motorized system routes within the planning area. Five action alternatives have been provided that look at a reasonable range of both motorized and non-motorized uses while balancing these recreational demands with environmental/biological concerns. The IDT analyzed each

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	alternative appropriately following laws, policies, and procedures that are in place. The final decision will include future management direction that will also comply with laws, policies, manual direction.

Region	Forest	District	NFS Acres	Current Status	Projected Date for Designation	Existing NFS Roads	Existing NFS Roads Open to Motor Vehicle Use	Existing NFS Trails	Existing NFS Trails Open to Motor Vehicle Use	Existing NFS Trails Open to Motor Vehicle Use (Single-Track)	Acres Currently Open to Cross-Country Motor Vehicle Use
1	Helena	Townsend	274,000	Existing	9/7/2006	719	414	228	45	13	0
1	Helena	Lincoln	376,000	Existing	9/8/2006	563	437	229	71	22	0
1	Helena	Helena	325,000	Existing	9/8/2006	865	559	232	32	3	0
		Totals	975,000			2,147	1,410	689	148	38	0
				Miles of Open Road per Square Mile =			0.66				
				Total Roads and Trails Open to Non-Motorized Use, Miles				2,836			
						Non-Motorized Trails, Miles =		541			
						Non-Motorized Trails, % =		78.52%			
							Motorized Trails, miles =		148	38	
							Motorized Trails, % =		21.48%		
								Trails Open to Motorcycles %		5.52%	

http://www.fs.fed.us/recreation/programs/ohv/

http://www.fs.fed.us/recreation/programs/ohv/travel_mgmt_schedule.pdf

NOTE: This data is out of date by at least 6 years and does not reflect significant motorized closures that have occurred since the data used to produce this table was put together by the Forest Service.

In order to bring equality to the allocation of non-motorized to motorized trails in the Helena National Forest must either convert 197 miles ((689/2)-148) of non-motorized trails to

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motorized trails or 393 miles (541-148) of new motorized trail must be constructed. The Divide Travel Plan did not adequately address this imbalance and it was a step in the wrong direction by creating an even greater imbalance. This significant issue must be adequately addressed as part of the Divide Travel Plan.
Reasonable seasonal closures for the hunting season is a far more reasonable alternative than total motorized closures to address the issue of “fair chase”.
In regards to public involvement in the travel planning process an important distinction must be recognized. Citizens have been conditioned by nearly all other agencies when it comes to public infrastructure. Other public agencies actively seek

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out and look after the needs of the public and provide clean water, sewer, and adequate public roads and highways without significant public input. Bottom-line, the public including motorized recreationists have been conditioned by other agencies that adequately consider their needs without a protracted (6 year) and demanding input process. The travel planning process must have reasonable expectations in regards to public involvement and also include an adequate internal process to properly identify the site-specific needs of motorized recreationists. Each alternative proposes closures of existing motorized CDNST trail. This is illegal per the original National Trail System Act, and the CDNST EIS and ROD. See a separate CTVA submittal with more details on this issue. The CDNST enabling law required that existing motorized reaches of the CDNST remain open for motorized use. Several reaches of the Continental Divide National Scenic Trail ignored the requirements of the law and were illegally closed to motorized use including Bison Mountain North and South, McDonald Pass to Jericho, and Black Mountain North. Supporting information is provided in a separate CTVA comment submittal. We request that these illegal closures be re-opened as part of this action. (116-29a) Furthermore, past actions closed motorized reaches of the CDNST such as Bison Mountain, McDonald Pass South and Black Mountain North which were open to motorized travel. These reaches of the CDNST must be reopened in order to be in compliance with the law and ROD. (116-29b) While Revised Statute 2477 was repealed by the 1976 National Forest Management Act, the revision clearly stated in the Act was to insure that no new roads from the effective date of the Act would be considered for RS 2477 consideration. It further clarified the historical highways would be honored. That is all that the 1976 Act modified or repealed. Until the federal government completely repeals the 1866 Act, (Revised by the 1872 Act) in its entirety the citizens of the United States still have the right to access lands for the benefit of the people of the United States. The decision rendered by the 10th circuit re-affirms this (http://www.kscourts.org/ca10/datefile/datefile.htm look under 9-8-2005 , and then 04-4071 Southern Utah Wilderness Alliance v. Bureau of Land Management). The	

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court has ruled that the rights exercised by the counties would be valid if the routes in question were indeed 2477 classified. The county has records that show that the routes were there prior to the establishment of the 1976 NFMA and FLPMA and, are therefore, valid RS 2477 routes. Additionally, it is the responsibility of the agency proposing a closure action to adequately research those records and establish which routes meet RS 2477 classification and then consult and coordinate with the We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 11 of 23 County with respect to that classification. The Divide Travel Plan project area includes many important RS 2477 routes that were established by miners, loggers, and early settlers. We provided additional background on RS 2477 in our comment file "CTVA Divide Comment Letter 3 1 14 2009". A Grizzly Bear study in the Swan Valley of Montana found that 99 percent of the bears spent 99 percent of their time on Plum Creek property as shown in the following aerial photograph. This property has been heavily logged resulting in undergrowth plant species that support bears. Thick and overgrown timber does not allow for adequate undergrowth. As we now see by this study, critical bear habitat is quite different than what was once assumed and this new information must be incorporated into this evaluation. The Forest Service should discard the original "road density guidelines" and develop new guidelines that reflect the habitat most critical for bears as one that is timber harvested and roaded. Old outdated science formulated by assumptions should not be used when true science and actual data is now available. (116-30)	

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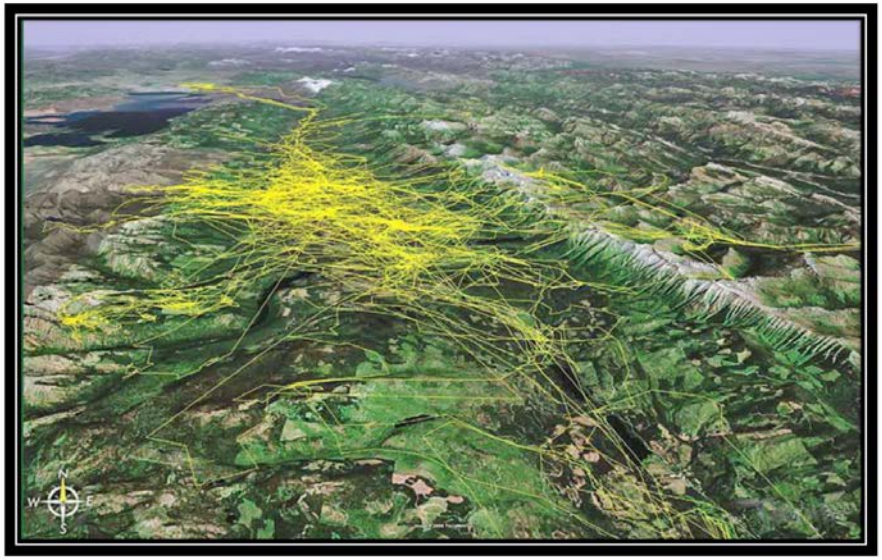 Figure 1. Grizzly bear movements based upon GPS collar telemetry studies conducted by Waller (2005) in the Swan Valley of northwest Montana (from a July 19, 2005 presentation by USFWS Grizzly Bear Recovery Coordinator Chris Servheen in Kalispell, MT). 67. Agency actions geared toward closing public access and restricting natural resource production on public lands are being justified by very old, outdated technology from the 1980's and 90's. Recently at the May 14-15, 2014 meeting (http://leg.mt.gov/css/Committees/interim/2013-2014/EQC/Meetings/May-14-15-2014/may-14-15-2014.asp)Montana's Environmental Quality Council (EQC) and 25 other elected officials requested use of current technology in agency plans and actions related to grizzly bears. Our statement acknowledged the federal government's 21 year old Grizzly bear Recovery Plan is outdated and, "is no longer based on the best available science". EQC further affirmed, "Important new research is available, recent grizzly bear studies based upon GPS satellite monitoring and DNA analysis offer better quality and more accurate	(116-28) Thank you for your input.

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We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 12 of 23 data, and proper planning is critical for bears, people, and resource management." EQC concluded, "The current recovery plan, based upon outdated science, continues to impact resource management and limit access and use of public lands, land management options, and our economy." To demonstrate this point the aerial photograph shown above from a 2005 University of Montana scientific study which reveals over 20,000 GPS locations of 23 grizzly bears in NW Montana was shared with EQC. For a decade or more, state and federal agencies have failed to bring forth current scientific data such as this which may contradict their conclusion that bears avoid roads. (116-31) These agencies continue to base their decisions predominantly on a substandard 1997 study of just 2 female bears which used limited technology and underwent no credible scientific peer review. The outdated reports, touted by agencies as "best available science", are being used to close and obliterate public access roads, restrict recreational activity, shut down natural resource industries, cripple our economy, and allow catastrophic wildfire fuel loads to build up on millions of acres of public lands. A study of sound levels from OHV use was found to be less than the background noise of the wind in treetops (Nora Hamilton, Mendocino National Forest, memorandum to the file, November 17, 1992). Also, the USDA FS Technology and Development Program in a report prepared in 1993 and titled "Sound Levels of Five Motorcycles Traveling Over Forest Trails" found that at distances over 400 feet, motorcycles do not raise the ambient sound level (they are no louder than background levels of noise). Absolute quiet is not a reasonable expectation. Sound from motorized sources such as airplanes exists even in the most remote areas. It is not reasonable to expect absolute quiet in areas intended for multiple-use. The sound level of motorized recreation use is not greater than natural sounds, and therefore, sound level should not be used as a reason to justify motorized recreation and access	(116-29a&b) Thank you for your comment. We are analyzing the effects of each alternative for the CDNST appropriately and following laws, policies, and procedures that are in place. The final decision will include future management direction that will also comply with laws, policies, manual direction, and procedures that apply. We carefully considered all options for motorized and non-motorized use along this trail to ensure consistency with the 2009 Comprehensive Plan, the National Trails System Act, and Forest Service direction.

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closures. (116-32) A study of National Park elk habituated to human activity and not hunted were more sensitive to persons afoot than vehicles (Shultz, R.D. and James A. Bailey "Responses of National Park Elk to Human Activity", Journal of Wildlife Management, v42, 1975). Therefore, hikers disturb elk more than motor vehicles and "disturbance of wildlife" should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors. (116-33) Hikers disturb nesting birds (Swarthout, Elliott and Steidl, Robert, Journal of the Society of Conservation Biology, February 2003) yet restrictions on hiking and other non-motorized recreationists to reduce impacts on nesting birds are rarely imposed. (116-34) Hiking, cross-country hiking and wilderness uses also causes trail impacts yet these impacts are seldom acknowledged. For example, the USDA FS Intermountain Research Station Research Paper INT-450 "Changes on Trails in the Selway-Bitterroot Wilderness, Montana, 1978-89" and dated 1991 found that many trail segments changed markedly, depending on site and use. Additionally the report "Keeping Visitors on the Right Track -Sign and Barrier Research at Mount Rainer", Park Science 14(4) published in 1994 found that off-trail hiking is a major We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 13 of 23 source of impact that creates trails and erosion throughout the several thousand acres of subalpine meadows. Additionally the report "Erosional Impact of Hikers, Horses, Motorcycles, and Off-Road Bicycles on Mountain Trails in Montana", Mountain Research and Development, Volume 14, No, 1, and published in 1994 found that multiple comparison test results showed that horses and hikers made more sediment available	(116-30) A description of the kinds of diverse habitats used by bears is included in the Wildlife Background Report (p. 81). A landscape with a mosaic of different forest structures, grasslands, riparian sites, shrubfields, and so on is the most useful to grizzly

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than wheels, and this effect was most pronounced on pre-wetted trails. There are many double-standards in the impact analyses and decision-making. If the issues surrounding motorized travel are significant enough to justify closures, then, in order to avoid introducing a bias to the evaluation and process the same issues and restrictions should also be applied to hiking, mountain climbing, cross-country hiking, wilderness users, etc. (116-35) A study of the heart rate of elk found that humans walking between 20 to 300 meters from the elk caused them to flee immediately 41% of the time while an OHV passing within 15 to 400 meters of the elk caused them to flee 8% of the time (Ward, A. L. and J. J. Cupal. 1976. Telemetered heart rate of three elk as affected by activity and human disturbance. USDA Forest Service, Rocky Mountain Forest and Range Experiment Station. Laramie, WY. 9 pp.). Therefore, hikers disturb elk more than motor vehicles and "disturbance of wildlife" should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors. (116-36) A study of mule deer found that 80% fled in reaction to encounters with persons afoot while only 24% fled due to encounters with snowmobiles (David J. Freddy, Whitcomb M. Bronaugh, Martin C. Fowler, "Responses of Mule Deer to Persons Afoot and Snowmobiles", Wildlife Society Bulletin, 1986). Therefore, hikers disturb deer more than motor vehicles and "disturbance of wildlife" should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors. (116-37) A lynx study completed in the Seeley Lake area found no adverse impact to Lynx from winter snowmobile use. The results of this study and the data that was collected must be used in evaluating areas open or closed to snowmobiles. The closure of any area because of winter motorized impact to lynx is not valid and, therefore, must not be used to initiate closures. (116-38) The wildlife sections of the travel plan document tends to promote two underlying themes; (1) wildlife and forest visitors cannot coexist, and (2) there are significant negative impacts to wildlife from visitors to the forest. (116-39) Observations of	bears. However, a large body of research indicates that most bears will avoid egularly traveled roads and the higher the density of these roads, the less suitable habitat is available for the bears to use on a regular basis (Wildife Background Report, p. 82, 186). Of most concern are motor routes that penetrate kay habitat sites that tend to focus bear activity (riparian areas, wet meadows, productive shrubfields, whitebark pine stands, etc.) (p.187).

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wildlife in Yellowstone and Glacier National Parks and the 600 deer that live within the Helena city limits combined with common sense tell us that wildlife can flourish with millions of visitors and motorized vehicles. Wildlife can and do effectively coexist with motorized visitors in even the most heavily visited places. Therefore, concerns with motorized forest visitors and wildlife are We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 14 of 23 over-stated and over-emphasized which unfortunately demonstrates a predisposition in the process. 79. The wildlife/visitor interaction in national parks demonstrates that the manner in which visitors coexist with wildlife is the most significant factor in the interaction between wildlife and visitors. The manner in which visitors coexist with wildlife in national forest can be shaped by adequate use of mitigation measures including seasonal closures, educational programs and trail rangers. Therefore, reasonable alternatives to the closure of motorized roads and trails exist and can be used to address wildlife concerns. (116-40) We request that these sorts of reasonable alternatives to closure of roads and trails to motorized visitors be adequately considered and incorporated into the preferred alternative.	(116-31) New patterns of use by grizzly bears in the Northern Continental Divide Ecosystem (NCDE) are discussed in the Wildlife Background report (p. 82) and the equivalent wildlife section in the FEIS. Bears will travel on Forest roads—especially low-use roads, and they typically use them at night. Those bears that frequent areas of regular human use around roads, dwellings, campgrounds, etc. are inevitably the ones that are removed by management action (killed or removed to other locations).

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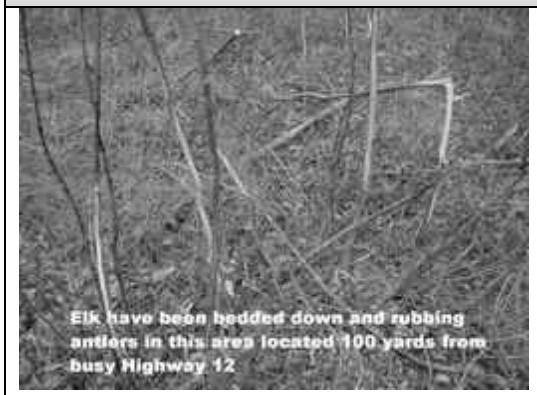 The road density criteria is not valid because hundreds of deer in Helena and elk in the Montanan City area exist just fine with road densities far in excess of the targets for the project area. Obviously there are other factors that have a far greater influence on deer and elk populations and the analysis must uncover and use those. The actual zone of influence of motorized trails on wildlife is very small. "Present day populations of white-tailed deer and elk are at their highest levels recorded in recent history" (Montana Wolf Conservation and Management Planning Document, Montana Fish, Wildlife and Parks, January 2000 (http://www.fwp.state.mt.us/wildthings/wolf/wolfmanagement011602.pdf). Additionally, "nearly 60 percent of Montana's original elk management units exceed elk-population objectives, while only 31 percent exceed harvest objectives" (www.fwp.state.mt.us/hunting/elkplan.html). (116-41) Additionally, the Northern Continental Divide Ecosystem (NCDE), outside of Glacier National Park, has grizzly bear population densities of about 1 bear per 20-30 square miles and has human recreation consisting of motorized access, motorized recreation, hiking, fishing, camping, horseback riding, and big game hunting. Glacier National Park annually receives approximately 2-3 million visitors, does not allow hunting, and has grizzly bear population densities estimated at about 1 bear	(116-32) There is a reasonable expectation for hikers and others who wish to experience the National Forest as a natural environment that there will be areas where unnatural noises are not a constant part of the equation. Those sounds are all around us all day long in most of the rest of our world. The combination of non-natural motor sounds along with the intrusion an unnatural, fast-moving machine is a problem for a number of key wildlife species. We expect to maintain parts of the Forest where this is not a problem. (116-33) This has been discussed above: people afoot cause greater increases in heart rate/pulse than motor vehicles. However, the effect is much more local. Motor vehicles have been shown to generate slightly lower increases in pulse rate, but the effect covers a much broader area over a much longer distance—and thus is disruptive of more wildlife in any given area within a given time period. (116-34) Wherever humans on foot have proven a problem for local wildlife in the past, we have restricted all use or taken other measures to discourage human presence during the critical time

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per 8 square miles. The Yellowstone Ecosystem (YE) which is comprised of Yellowstone Park and surrounding National Forests, receives more visitation than Glacier Park and has an increasing grizzly bear population estimated at 1 bear per 30-50 square miles (http://www.r6.fws.gov/endspp/grizzly/bittereis/deischp2.htm). All indications are that grizzly bear habitat is fully occupied and that additional road closures and obliteration will not produce any more bears and, therefore, motorized closures are not reasonable or productive. Further evidence of this condition is the fact that grizzly bears are moving out onto the prairies around Valier and Choteau. Therefore, grizzly bears can coexist at reasonable population densities with multiple-use recreation and there is no compelling We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 15 of 23 reason to close roads and trails to motorized recreationists to increase grizzly populations because the most significant constraint is their need for so many acres between other grizzly bears. (116-42) Furthermore, Kate Kendall's Greater Glacier Bear DNA study (includes all the North Fork of Flathead), (116-43) which identified 367 unique individual bears with one years data not yet analyzed. The recovered population target was 600 bears for the entire Northern Continental Divide Ecosystem, so there is already known that about 2/3 of that target exist on about 1/4 of the habitat. Completion of DNA study of the rest of the ecosystem is certain to show that bear populations far exceed the recovery goal and should be de-listed. The study was released in December 2006 and indeed did confirm that there was more than 545 bears in the ecosystem (http://www.greatfallstribune.com/apps/pbcs.dll/article?AID=2006612240302). Furthermore, a study released in September 2008 found that there were at least 765 grizzly bears (http://www.helenair.com/articles/2008/09/17/top/55st_080917_grizzlies.txt . It is	period (esp. around nesting eagles, goshawks, certain elk calving sites). (116-35) Thank you for your comments. As expected, the public comments on this project expressed the full range of opinions regarding motorized use. We heard from many people who would prefer more motorized opportunities, as well as those who would prefer more non-motorized opportunities. Both points of view were considered in meeting the Purpose and Need to better manage natural resources, improve recreation management in regard to motorized recreation and decrease user conflicts. Please

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clear that the grizzly bear populations are healthy and that motorized recreationists should no longer be shut out of grizzly bear habitat.	see the Recreation analysis of the EIS for the effects of each alternative on motorized and non-motorized opportunities.
85. As of 2007, the grizzly bears in the Yellowstone region were delisted by the agencies.	(116-36) This issue has been discussed above.
86. The number of hunters is declining (U.S. Fish and Wildlife Service, 1996 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. http://library.fws.gov/nat_survey 1996.pdf and http://www.cbsnews.com/stories/2007/09/03/national/printable3228893.shtml). Therefore, there are no compelling reasons "to elevate the level of elk security in the project area and…enhance elk populations" as frequently suggested by wildlife biologists (example; Fish, Wildlife and Parks letter dated February 27, 2002 to Helena National Forest on the Clancy-Unionville Travel Planning Project, bottom of page 9). Additionally, there are no compelling reasons to justify reduced road densities as a sought-after or necessary wildlife management criterion. Lastly, there are reasonable alternatives including permit hunting and seasonal travel restrictions that can better accomplish the outcome sought by reduced road and trail densities. NEPA requires consideration and implementation of all reasonable alternatives. Not considering and implementing reasonable alternatives demonstrates a predisposition in the process.	(116-37) This issue has been discussed above: hikers do not disturb deer more, they disturb them in a different way than snowmobiles. A snowmobile will disturb many more deer over a much broader area than a person afoot within a given time period. (116-38) This issue is discussed in the Wildlife Background Report in sections on "Canada Lynx" (p. 91, 98, 193-194) and in equivalent Wildlife sections of the FEIS. Most recent studies have concluded that lynx generally do not avoid packed snowmobile trails and often use them as travelways. The problem is that they also serve as travelways for competing carnivores (coyotes, bobcats, foxes, mountain lions) that would otherwise not be able to access winter lynx habitat through deep unpacked snow. For this reason, the Northern Rockies Lynx Management Direction (NRLMD)—now part of the Helena Forest Plan—has a standard that allows no net increase in packed over-the-snow routes in lynx habitat within a given lynx analysis unit (LAU).
87. In the past many of the impacts associated with motorized recreation were based on opinions about the impacts on wildlife. The courts have clearly established the prevailing standard for evaluating scientific evidence in Daubert vs. Merrell Dow Pharmaceuticals Inc. (DAUBERT v. MERRELL DOW PHARMACEUTICALS, INC., 509 U.S. 579 (1993)) (http://caselaw.lp.findlaw.com/scripts/printer_friendly.pl?page=us/509/579.html), in which the U.S. Supreme Court ruled that expert testimony must be based on a testable theory or method that has passed peer review, has a known error rate and has reliable results. In part, the Daubert ruling was triggered by the proliferation of experts and professional witnesses who expressed their opinion in reports and	(116-39) The wildlife Analysis does not contend that wildlife and

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testimony as opposed to sound scientific principles and evidence. Therefore, peer reviewed reports and recommendations are mandatory in order to protect the public from personal opinion. We request that an adequate peer review plan and process be used for all impact analyses and include experts that are neutral about motorized recreation. (116-44) We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 16 of 23 88. Wildlife security criteria and standards in the forest plan are out of date. (116-45)The science, data and findings as far as road density and impact of motorized vehicles on wildlife have changed significantly. This new information must be considered in this evaluation as required by federal best available science and data accuracy requirements. 89. OHV use and wildlife can and do coexist. We do not see any evidence in the field that would indicate that summer motorized recreation use is a significant wildlife problem. We support motorized closures where necessary to protect wildlife during the spring calving season and hunting season while maintaining a reasonable level of access during those periods. (116-46) We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 17 of 23 SPECIFIC IMPROVEMENTS PROPOSED FOR ALTERNATIVE 2 Specific improvements to the proposed Alternative 2 that we would like to be included so that it becomes a Pro-Recreation Alternative and the Preferred Alternative for Divide Travel Plan include:	Forest vistors cannot coexist: it simply concludes that certain wildlife species do not do well with constant human presence and that a suitable proportion of the Forest needs to be maintained free from motorized disturbance and from human access allowed by motor vehicles. (116-40) Research and past history of the disappearance or near disappearance of several prominent wildlife species from the Forest in the past attest to negative impacts generated by humans. A glance at the maps of Yellowstone and Glacier National Parks make obvious the fact that most of their areas are beyond the reach of their limited road networks. Species such as elk that in non-Park areas seldom frequent areas around roads are able do do so in the Parks because (1) they are not hunted in those areas and (2) they have ready access to vast backcountry with no motor vehicle presence and relatively few people. We cannot provide backcountry habitat of this magnitude in the Divide landscape, but we can provide a number of non-motorized blocks that can accommodate some of these wary species when they need to go there. That is a large part of our mitigation, along with keeping motorized use out of key productive sites, such as riparian sites and wet meadows, that act as magnets for a variety of wildlife because of their importance. Some of things that National Parks

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1. We would like further consideration of the routes shown on the attached CTVA proposed routes maps in order to provide the sort of reasonable Recreation Opportunity Spectrum that motorized recreationists are looking for in the project area and the Helena National Forest. a. Sweeny Creek Maps b. Divide Travel Plan Pro-Recreation Alternative Map 2. The public is most familiar with the traditional forest map. This is what they have referred to for decades when visiting the forest. The alternatives should be shown on the traditional forest map. (116-47) 3. Summer and Winter motorized recreation are distinctly different and should be shown on separate maps. Basically, what is needed is one map showing summer recreation roués and one map showing winter routes based on the Helena National Forest base map for each alternative. (116-48) 4. The Cellar Gulch ATV trail needs to have the spring closure date adjusted to a May 15th opening date so that this important interconnect to the Helmville-Gould trail and others routes can be used during the early season. We have made this request in a number of previous submittals and were told that it would be included in the travel planning process. (116-49)	are able to do by way of mitigating human /wildlife encounters are not possible in a National Forest area such as the Divide landscape because of our different missions, our multiple use management direction, different kinds of personnel, and, above all, the absence here of the ubiquitous non-motorized backcountry that serves a a refuge from most human presence. (116-41) Actually, at the present time, white-tailed deer populations are at a low ebb in many areas of the state—to the point that the Fish and Game Commission has suspended whitetail hunting in some districts. Be that as it may, this does not appear to be a function of human intervention, but rather, a couple bad springs and a widespread parasite (Wildlife Background Report, p. 79). These populations will be back up before long. Elk population numbers are at or above MFWP objectives in the 4 hunting districts that overlap the Divide landscape (or in the case of HD 293, in the southern portion of

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5. The following are important existing routes proposed for closure that provide the high quality of OHV experience that is needed by the public. We request these routes remain open as part of a Pro-Recreation Alternative: 1811 (loop opportunity) 1852 (loop opportunity) 1852-B1 (loop opportunity) 1852-A1 (upper Spring Gulch) 136 A1, B2, others (loop opportunity) 708-A1 to 4026-B1 (loop opportunity) 4044-B1 to 1849-A1 (loop opportunity) 4045-B1 to 4044 (loop opportunity) 708-H1 (loop opportunity) We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 18 of 23 708-F1 (loop opportunity) 708-G1 4006 1855-B2 (closed for CDNST = not legal per CDNST act) 1855-C2 (loop opportunity) 335-B1 (closed for CDNST = not legal per CDNST act) 335-B2 (closed for CDNST = not legal per CDNST act) 1802-B2 (closed for CDNST = not legal per CDNST act) 1871-002 (loop opportunity) 527-B1 (Sally Ann Creek) 1857-B1 1857-B4 1857-A3 to 1857-A5 (loop opportunity) 495-A1527-A2 (mapping does not include connection to 1863)	the district, which covers poart of the Travel Plan Area). Bull/cow ratios, however, are just at minimum desired levels and the percentage of mature bulls is far below what would be expected in a healthy natural population (Wildlife Background Report, p. 70-77). (116-42) This issue has been discussed above. As noted in the Wildlife Background Report (p. 83, 85-89, 184-187) and equivalent sections of the FEIS, grizzly bear populations in the NCDE (including Glacier NP) are much more robust than in the Divide landscape because of the availability of much larger blocks of non-motorized habitat in and around the Bob Marshall Wilderness complex. The same is true of Yellowstone NP. In the National Parks, grizzlies contend with humans in vehicles only along narrow ribbons of road corridor. Most of the parks consist of vast areas of wilderness. This is what allows the populations to flourish. If we are to maintain a small resident grizzly population in the Divide landscape, we need to follow suit to the degree possible and provide large blocks of non motorized habitat in amongst the road and motor trail network. The goal is not to build and sustain populations of the order of the NCDE, but to accommodate a few local bears in an environment that will allow them to stay out of trouble with humans.

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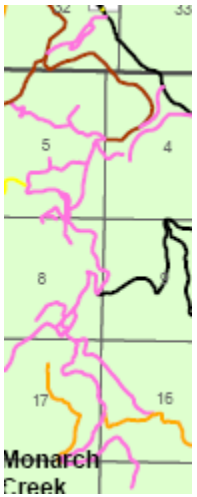
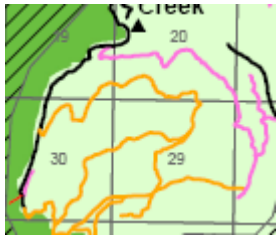
4009-A1 4009-B2 314-J3 314-E1 to 314-A1 (loop opportunity) (116-50) 6. Currently closed routes that we request to be opened to mitigate for past closures as part of a Pro-Recreation Alternative: 1801 (was closed by timber sale, reopen as an enhancement) 1801-A2 (was closed by timber sale, reopen as an enhancement) 1801-A3 (was closed by timber sale, reopen as an enhancement) 1856 series (area was closed by timber sale, reopen as an enhancement) 314-J3 extension connector to 1868 1869-B1 connector to 1870-C1 (116-51)   7. The Sweeny Creek area is an important motorized recreational opportunity now that the BLM has closed the Scratch Gravel Hills to OHV use. The Scratch Gravel	(116-43) This issue was addressed previously: population characteristics for bona fide grizzly bear recovery areas in the NCDE do not apply to the situation in the Divide landscape.

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Hills was the We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 19 of 23 closest opportunity to Helena and many recreationists used it extensively for short trips and high school aged recreationists use it after school and because they cannot travel far. Now all of these visitors seeking recreation in close proximity to Helena rely on motorized recreation in the Sweeny Creek area. It would be a very significant impact on our youth to close the Sweeny Creek area. In fact, it has the potential to be a positive demonstration project of good things that kids can occupy their time with. These facts must be evaluated as part of the Divide alternative development and decision. (116-52)	
8. We enjoy dispersed camping and riding opportunities in the Divide project area. Some of our favorite trails include Ontario Creek, Meyers Hill loop, and the Tenmile Historic mining loop. We frequently use the Sweeney Creek area, and road 227 past the Kading Campground including the ATV trail up the Kading Grade to Baggs Creek, the Limburger Springs to Baldy Ridge loop, and the Hope Creek-CDNST loop. We also use all motorized segment of the Continental Divide National Scenic Trail including the Helmville-Gould trail all the way to Dalton Mountain and the Flesher Pass to Stemple Pass route. We use all of the routes shown on the attached set of maps prepared from information from our members. Please note that these maps are not intended to show all of the existing routes. We do not have enough resources to complete that level of investigation and we must rely on the Forest Service to provide a complete inventory. These maps are intended to demonstrate the type of loops and destinations that OHV recreationists enjoy today and have a need for. The loss of any of these routes would be a significant issue with our members because of the significant impact on our members. This need must be addressed as a significant issue in the analysis. (116-53)	(116-44) A perusal of the Wildlife Background Report, including its 20 pages of References Cited (p. 290-310) will attest to the fact that the analysis is grounded in scientific research and professional management recommendations. (116-45) Alternative B is designed to “more closely align current science, local conditions, and other information with the needs of big game, particularly elk, which meet the intent of the Forest Plan”. See the section Purpose and Need for Amendment in the Forest Plan amendment. (116-46)The effects of open roads on elk are well researched and

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9. The following routes are significant motorized routes that create loops or access to destinations. We request that they be included in the preferred alternative. d. Kading Grade e. Trail behind Kading Cabin f. Hope Creek g. Black Mountain spur h. Spurs off Telegraph Creek road that lead to historic mines. These are important experiences for our culture and traditions. i. Spur off Telegraph Creek road to Jericho Creek meadow which is part of the motorized section of the CDNST.(116-54) 10. The Ontario Creek ATV route and a loop at Treasure Mountain are reasonable OHV routes. We need at least several loops and destinations in this area to make this a viable summer weekend camping area. 11. We request the alternative include the OHV Mine Tour proposal and route requests that we submitted in comments dated January 1, 2009. (116-55) 12. We request the addition of motorized routes connecting into the new Spotted Dog WMA to take advantage of routes in the WMA and create longer distance motorized loops for OHV recreationists in the Little Blackfoot drainage. This enhancement would also provide much need connections to adjoining BLM and National Forest lands so that OHV could travel across the state. (116-56) We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 20 of 23 13. A reasonable alternative that would lend itself to a Pro-Recreation Alternative would be the conversion of timber harvest roads to OHV trails such as those in this area: (116-57)	documented. See the section 'Recent Science regarding Elk Management' in the Forest Plan amendment. (116-47) Thank you for your input.

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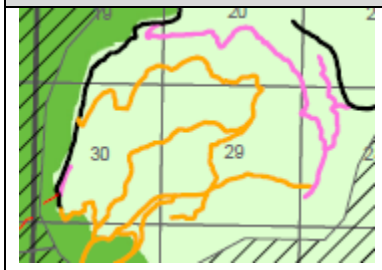
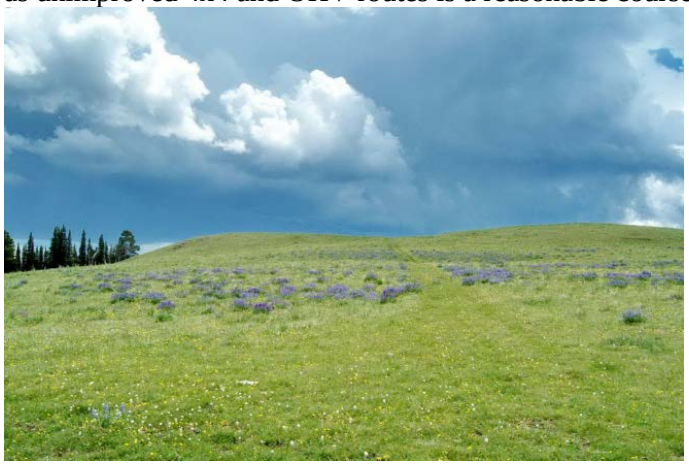
	(116-48) Thank you for your comment.
14. Many of the existing routes are unimproved 4x4 routes which are now used by smaller OHVs. These routes have been used by the public for decades and are largely grassed in and stable as shown on the following photograph. Continued use as unimproved 4x4 and OHV routes is a reasonable course of action. 	(116-49) The reason for the later opening date is that the trail runs through a well-documented elk calving area. The initial request for the extended closure came from MFWP, and Helena NF wildlife field surveys corroborated their information in the late 1990s. the current closure dates were put in place shortly thereafter.
15. Many of the motorized trails are in one small area, Sweeny Creek. Bottom-line, we would like to see a Pro-Recreation alternative included with 30 to 50 miles of OHV route so that there is a reasonable motorized trail system to use. (116-58) 16. The 3-States OHV Record of Decision requires that the agency provide a site	(116-50) Thank you for your comment. Your request for the listed roads to remain open will be considered during the decision process on the FEIS. The decision on the FEIS and draft Record of Decision will be based on the findings in analysis and public comment of the DEIS.

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specific analysis for route including historic use, vehicle counts, and impacts on the culture, recreation and needs of motorized recreationists. It is not the public responsibility to provide these analyses. Please assure that the EIS meets all of the site specific requirements required by the 3-States ROD. (116-59) 17. We request that this project include adequate research of the county records and adequate formal consultation and coordination with the county to identify RS 2477 routes and include them as historic motorized routes. (116-60) 18. We recommend researching and identifying all historical sites such as but not limited to; quarries, mines, homesteads, cabins, and timber operations to preserve access to these historic features. Very little of this type of sites have been preserved in the Helena National Forest. EPA work and time has removed many of them. The legacy of the pioneers, early settlers, and miners are being removed from the landscape. We recommend that interpretative facilities be provided for future generations by construction a kiosk at parking lots and installing trail direction/mileage and destination signs. (116-61a) We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 21 of 23	
19. OHV Historic Mining District Tour: An interpretative tour to preserve the mining heritage in the Divide Project area. a. Provides the type of long-distance figure 8 routes, loops and side destinations desired by OHV recreationists i. Loops ranging from 20 to 60 miles ii. Many stops and side destinations iii. Documents and preserves the historic nature of the area b. Uses mainly historic routes that exist on the ground today. c. May require dual-use or street-license but would be more user-friendly if it was	(116-51)Thank you for your comment. Your request for the listed roads to be opened will be considered during the decision process on the FEIS. The decision on the FEIS and draft Record of Decision will be based on the findings in analysis and public comment of the DEIS.

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open to all OHVs as dual-use routes. d. Grants could be used for signing at each site and the development of interpretative literature, brochures, and maps. e. Grants could be used where required for route improvements. (116-61b) 20. All current motorized sections of the CDNST must remain open to motorized including the ¼ mile spur route at Jericho Creek is an existing motorized reach of the CDNST and must remain open per the original National Trail System Act, and the CDNST EIS and ROD. (116-62) We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 22 of 23 LIST OF COMMENTS SUBMITTED FOR THE RECORD AS OF 6/11/2014 INCLUDE: CTVA Divide Travel Plan Comments 6 10 2014 CTVA Divide Travel Plan Comments 5 25 2014 CTVA Divide Travel Plan CDNST Comments 5 15 2014 CTVA Divide Travel Plan Comments 4 5 2014 CTVA Letter to Wood 3 24 2012 CTVA Divide Comments Sweeney Submittal 10 1 2011 CTVA Divide Comments Map Submittal 9 24 2011 CTVA Telegraph Vegetation Project Comment Letter 12 12 2009 Sweeney Creek alternative email Harp 5 13 09 CTVA Divide Comment Letter 4 5 11 2019 CTVA Divide Comment Letter 3 1 14 2009 CTVA Divide Comment Letter 2 1 15 2009 CTVA Divide Comment Letter 1 1 6 2009	(116-52) The key part of lower Sweeney Creek from a wildlife perspective is the northwestern part of the area—the open aspen/bitterbrush/ bunchgrass habitat that serves as important winter range for moose, deer, and elk. This is the area that we would like to protect from motorized use in winter and early/mid spring (Wildlife Background Report, p. 271-274).

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Letter to Duane Harp 4.3.08 Letter to Duane Harp 3.16.08 Negro Mountain Access Letter 6 26 2007 Cellar Gulch Letter 4 5 23 2007 Cellar Gulch Letter 3 Cellar Gulch Letter 2 Cellar Gulch Letter 1 USFS Telegraph Creek Letter July 13 2004 Telegraph Creek letter to Harp June 14 2004 HNF Travel Plan Comment Letter 7 HNF Travel Plan Comment Letter 6 HNF Travel Plan Comment Letter 5 HNF Travel Plan Comment Letter 4 HNF Travel Plan Comment Letter 3 HNF Travel Plan Comment Letter 2 HNF Travel Plan Comment Letter 1	(116-53) Thank you for your input. Changes in route designations has been analyzed for each action alternative. Also, alternative 5 was designed to enhance motorized loop opportunities.
LIST OF MAPS SUBMITTED FOR THE PROJECT RECORD AS OF 6/11/2014 INCLUDE: CTVA OHV Historic Mining District Tour 9 16 2011 CTVA Divide North Map 9 16 2011 CTVA Divide South Map 9 16 2011 CTVA Divide North 11 27 2008 CTVA Divide North 11 27 2008 CTVA Sweeny Alternative 11 27 2008 CTVA Sweeny Alternative 5 10 09 CTVA Sweeny Alternative 4 5 2014	(116-54) Thank you for you input.
VERBAL COMMENTS PROVIDED AS OF 6/11/2014: 1. CTVA monthly meeting on 3/25/2014	(116-55) Alternative 5 incorporates this proposal as well as historic mine tour route around Treasure Mountain.
We would be happy to provide any of these materials if you cannot find them in your file.	(116-56) Thank you for your input.

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We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education. Page 23 of 23	(116-57) Thank you for your input. Conversion of timber roads to OHV trails were considered in the design of the different alternatives.

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	(116-58) Thank you for your input. (116-59) The Tri State OHV Environmental Impact Statement defines site specific analysis in Appendix B page 216 as relatively detailed information, including the location, condition and current uses of individual roads and trails and the identification of when and where individual roads and trails will be open or closed to various types of use. It is dependent of on the availability of funds and resources. Site specific analysis was conducted in the development of the preferred alternative. (116-60) The agency selected alternative will meet applicable laws, regulations, and standards. Project design features and best management practices would apply to any alternative selected, and are discussed in the EIS. (116-61a&b) The Helena National Forest currently manages 945 known cultural resources, of those, 238 cultural resources represents quarries, mines, homesteads, etc. The Helena National Forest also has 14 Historic Mining District that cover large landscape which include multiply associated features, such as building ruins, adits, shafts, ditches, roads, and trash piles. Of those 945 cultural resources, 7 sites are listing in the National Register of Historic Places (3 of them are on the Helena Ranger District), 839 sites have not received eligibility determination, therefor they are treated as Eligible. Forty-eight sites have been determined Eligible for listing, but have not been formally listed

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	and 51 sites have been determine Not Eligible for listing in the National Register. A total of 181 cultural resources are identified within or adjacent to roads and trails in the Divide Travel Plan area. These cultural resources were discovered and documented as a result of prior cultural resource reconnaissance and project inventory in the travel plan area. On-the-ground inventory of each road and trail affected by the proposed Divide Travel Plan has not been undertaken because the Forest Service is considering only whether a road or trail will remain open or closed in this land use decision. Specific road closure methods, and their effects, will be the subject of separate environmental analyses. NHPA Section 106 compliance (including historical research) survey will be completed then, as necessary, for roads and trails proposed for obliteration. The proposed motorized route closures would be beneficial to cultural resources by preventing easy vehicle access to sensitive cultural resources which helps to abate vandalism and artifact theft. For example, historic mining buildings accessible by motorized routes located in the planning area have been dismantled to obtain antique wood for various decorative uses such as in home remodeling and picture frames. Mining equipment, such as ore carts and old equipment parts, have found new homes as lawn and landscaping ornaments. Prehistoric and historic properties are a non-renewable resource. They represent a resource base that cannot be replenished. For this reason several federal laws and regulations have been established that require federal agencies to identify, monitor, protect, and preserve cultural resources under their jurisdictions. Through the final NHPA Section 106 process, all undertakings would be

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	identified and addressed, and any necessary mitigation measures incorporated into the project design or other appropriate heritage resources agreement. The goal is to avoid, minimize, or mitigate impacts to significant cultural properties. Since the late 1970s, cultural resource inventories have preceded all ground-disturbing Forest Service projects on the Helena National Forest, including vegetation treatments, livestock grazing, restoration, and recreation development. The majority of the cultural resources described in this travel plan analysis were discovered as a result of these compliance inventories. In fact, many archaeological sites were found because they were exposed in old road and trail beds. In most cases, project boundaries and treatments would be reconfigured to avoid impacting significant cultural resources so they could be preserved and the effect of these actions on cultural resources would be relatively minor. All forest actions require NHPA compliance and consultation therefore the effects on cultural resources would be mitigated through project redesign and/or avoidance. Roads and trails have been constructed through archaeological and historic sites over a period of many years. Regardless of alternative, road use has the potential to degrade cultural resources, particularly prehistoric archaeological sites. Any federal actions that poses an adverse effect to cultural resources (for example EPA cleanup) is required to consult with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Office (SHPO) and the Tribal Historic Preservation Office (THPO) to mitigate those effects (36 CFR 800). A few examples of mitigations are public interpretation, data recovery, or site relocation.

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	The Helena National Forest has in the past and will continue to manage the Montana legacy for future generation through scientific investigations, preservation, restoration, rehabilitation, adaptive reuse (historic rental cabins), public interpretation and overall cultural resource management. The 1939 Helena National Forest Visitor Map is the map we currently use to determine the baseline age of trails and roads across the forest. The "existing and historic route" RS 2477 does not appear on the 1939, 1959 or 1969 Helena National Forest Visitor map; therefor we do not consider it a historic route or cultural resource. A full NHPA Section 106 analysis is not needed at this time because the proposed Divide Travel Plan decision in an administrative planning effort that does not have the potential to cause effects to historic properties. The Advisory Council on Historic Preservations national policy on cultural resources and road and trail designations states… "the following categories of proposals shall be considered undertakings with the potential to affect historic properties, triggering evaluation under Section 106 of the NPHA, 36 CFR part 800 and the applicable programmatic agreements: construction of a new road or trail; authorization of motor vehicle use on a route currently closed to vehicles; and formal recognition of a user-developed (unauthorized) route as a designated route open to motor vehicles. Existing, formally established system (classified) roads and trails, already open to motor vehicle travel, generally need not be re-evaluated for purpose of this rule. Their designation on a motor vehicle use

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	map will not generally be considered an undertaking for the purpose of NHPA and not subject to Section 106 review." FSM 2364.35 states one of the administrative measures to protect cultural resources from human-caused and environmental damage is "Closure to public and motor vehicle access". The closure of historic routes or routes that lead to sensitive cultural resources is considered a protection and preservation measure. Cultural resources (included historic routes) could be directly affected by permanent use and maintenance. Specifically, these routes provide access to cultural resources and thus invite vandalism, artifact collecting, arson, and other resource-deceptive behavior. For example, old access roads to the late 19th Century granite quarries in Sweeney Creek have been converted to a network of OHV trails. Because these trails now draw attention to the old quarry ruins, many have suffered various kinds of vandalism and abuse. (116-62) Thank you for your comment.
(117) From: C S Sanders <cs.sanders@live.com> Sent: Wednesday, June 11, 2014 8:02 AM To: FS-comments-northern-helena Subject: CDNST As a Montanan and resident of Helena I would urge the NFS to protect the Nevada Mountain wildlands along the Continental Divide National Scenic Trail by adopting Alternative #3. Please protect the CDNST and the headwaters of the Little Blackfoot River and surrounding areas as year-round non-motorized lands.	(117-1) Thank you for your comments.

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Our Helena National Forest needs and deserves protection. Respectfully, Colleen Sanders 811 8th Ave Helena, MT 59601	
(118) From: Joshua Stumpner <jstumpner@gmail.com> Sent: Wednesday, June 11, 2014 9:04 AM To: FS-comments-northern-helena-helena Subject: Continental Divide Travel Plan #24091 Please consider this a comment in favor of Alternative #4, though I must say that I feel it is very unfair to our disabled citizens that have had access to this area before to no longer be able to access it, as they are unable to make such hikes and rely on motorized vehicles. Please consider some other alternatives. Thanks, Joshua	(118-1) Thank you for your comments.
(119) Transcribed from hand written letter Received 06/12/2014 Zachary Cardosi 3935 County Rd 250 Durango, CO 81301 Dear Sir or Madam, June 5, 2014 The Reason I write this letter is because I love Montana's wild lands. The peace of mind knowing that there are still a few entact and pristine ecosystems up in Montana	(119-1) Thank you for your input

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helps me stay sane even when I live thousands of miles away. We have very few opportunities to keep areas throughout the lower 48 roadless and wild. We must think of the lasting implications the decisions we make today have on the environment and humans mental states in the future. I demand the designation of the proposal Nevada Mountain and Electric Peak Wilderness, and support the non-motorized prescription in Alternative 3. People are going to always want to ride their snowmobiles and OHV's in pristine landscapes, others are going to want to extract resources in sensitive habitats, and people are just going to continue to want to conquer. But only when the last trout has been caught and the last tree stands alone will they realize what has been lost. We need to make the ethical decision to preserve what is left of our wild landscapes, even if it infuriates different user groups, political groups, or local industries. This is because at the end of the day it is the right thing to do. Thanks, Zachary Cardosi (815)549-3139 zmcardosi@gmail.com	
(120) William and Judy Carrigan 7500 Priest Pass Road Helena, MT 59601 USDA Helena National Forest Helena Ranger District 2880 Skyway Drive Helena, MT 59602 June 11, 2014 Ladies and Gentlemen:	(120-1) Thank you for your input.

Comments	Response to Comments
We submit the following comments to the USDA Helena National Forest (HNF) for consideration of proposed changes to the motorized vehicle plan as discussed in the Divide Travel Plan Draft Environmental Impact Statement (EIS), and the Forest Plan Programmatic Amendment. My family and I have lived at 7500 Priest Pass Rd since early 1993. I am a professional geologist/hydrogeologist, and we are all avid outdoor enthusiasts. In the 21 years that we have lived in the Sweeny Creek area we have witnessed many changes. Most of the changes we have witnessed are the result of an increase in motorized use and traffic in the Sweeny Creek Area. In particular, in the past 5-10 years, motorized use on motorized trail roads (MTR) and in many instances, unauthorized trails in the Sweeny Creek area has increased several fold. The results have been erosion of topsoil, encroachment of noxious weeds, excessive garbage, firearm violations, destruction of private property, trespassing, harassment of livestock on private property, noise, dust, contamination of waterquality in the Sweeny Creek drainage just to name a few. We are increasingly saddened to watch the assault of a publically owned natural resource by self-serving motor enthusiasts who have the general attitude that an ATV or trail-bike gives them the right to blaze a path on public land, and in some instances, private land where none existed. I have witnessed numerous times during the last 5 years motorcycles and ATVs traveling behind our property (near its east boundary) using a fire-line as an undesignated trail to connect the network of trails such as MTR-008 with a former footpath that was part of the Sweeny Creek Nature Trail (NE4NW4 section 27). During this time we have experienced a bullet traveling overhead as we worked on our deck attached to our home. We have seen aspen trees on our property vandalized and 'cut-in-two' by a shotgun blast by an unknown trespasser. We have experienced trampled and/or cut fence by hunters dragging deer across our property to access Priest Pass Road from forest service land. We have found more than one 'poached' moose carcass lying next to Priest Pass Road on USFS land in section 28 (NW4NW4). We have seen garbage dumps of roofing shingles, wood pallets, computer parts, beer cans and bottles at sites next to or at the end of numerous MTRs and Priest Pass Road. A	

Comments	Response to Comments
small minority of the public seem to think it is OK to use Priest Pass Road and its network of trails as a county dump. And last year on a day in May and while hiking with my dogs I discovered two wildfires next to MTR 004 started by arsonist. Motorized use in the Sweeny Creek Area is 'out of control' and will only worsen if nothing is changed, and restrictions are not imposed by the USFS. We think motorized use in the Sweeny Creek Area has reached a 'tipping point'. Thus, we support a decision selecting Alternatives 3 and 4, which will close all wheeled motorized traffic on all MTRs in the Sweeny Creek Area. We do not see how the USFS can allow the current system of motorized recreational use in the Sweeny Creek Area to continue. We not only support closure of all motorized traffic on MTRs in the Sweeny Creek Area, but think strict enforcement is necessary to change the public's perception. Gates, fencing, and signs posting restrictions (similar to the gate at 1802-B2) and imposing fines are needed to restrict access and use at each trailhead location on Priest Pass Road. Thank you for allowing us the opportunity to read the draft EIS, and to submit comments on proposed alternatives considered by the USFS for The Divide Travel Plan. Sincerely, William and Judy Carrigan	
(121) William and Judy Carrigan 7500 Priest Pass Road Helena, MT 59601 USDA Helena National Forest Helena Ranger District 2880 Skyway Drive Helena, MT 59602	(121-1) Thank you for your comments.

Comments	Response to Comments
June 11, 2014 Ladies and Gentlemen: We submit the following comments to the USDA Helena National Forest (HNF) for consideration of proposed changes to the motorized vehicle plan as discussed in the Divide Travel Plan Draft Environmental Impact Statement (EIS), and the Forest Plan Programmatic Amendment. My family and I have lived at 7500 Priest Pass Rd since early 1993. I am a professional geologist/hydrogeologist, and we are all avid outdoor enthusiasts. In the 21 years that we have lived in the Sweeny Creek area we have witnessed many changes. Most of the changes we have witnessed are the result of an increase in motorized use and traffic in the Sweeny Creek Area. In particular, in the past 5-10 years, motorized use on motorized trail roads (MTR) and in many instances, unauthorized trails in the Sweeny Creek area has increased several fold. The results have been erosion of topsoil, encroachment of noxious weeds, excessive garbage, firearm violations, destruction of private property, trespassing, harassment of livestock on private property, noise, dust, contamination of waterquality in the Sweeny Creek drainage just to name a few. We are increasingly saddened to watch the assault of a publically owned natural resource by self-serving motor enthusiasts who have the general attitude that an ATV or trail-bike gives them the right to blaze a path on public land, and in some instances, private land where none existed. I have witnessed numerous times during the last 5 years motorcycles and ATVs traveling behind our property (near its east boundary) using a fire-line as an undesignated trail to connect the network of trails such as MTR-008 with a former footpath that was part of the Sweeny Creek Nature Trail (NE4NW4 section 27). During this time we have experienced a bullet traveling overhead as we worked on our deck attached to our home. We have seen aspen trees on our property vandalized and ‘cut-in-two’ by a shotgun blast by an unknown trespasser. We have experienced trampled and/or cut fence by hunters dragging deer across our property to access Priest Pass Road from	

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(122) Dave Carrol POB 141 Elliston, MT 59728 To Forest Supervisor Helena National Forest Service	

Comments	Response to Comments
June 12, 2014 Transcribed from hand written letter Received 06/12/2014 Re: DEIS Comments Divide Travel Plan Dear Mr Avery, I offer the following comments for consideration of your Decision on the Divide Travel Plan. The trails (OHV) in the Rimini Road/Hwy 12 area have been used for many years. I know the area is winter range, thus the trails must be managed with winter range values intact. However, those trails need to remain open- May 1- Sept 30 for the legal and reasonable use by OHV users. The multiple braded roads roads in the area of Blassbry, North to Hape Creek area need closure. Please leave access, but eliminate unnecessary roads. Consideration for access in the Spotteddog to Hat Creek Area must include access for OHV's. However I would urge them access be limited to –May 1 – Sept 15. Many bow hunters abuse the closures and enforcement is lacking. The crossing on the Little Blackfoot River needs to remain. This has been historic use. Open the bridge if you find a 'ford-type' crossing excessive. However the access to Negro Mtn needs to remain as is. Dual-use roads needs to be on this landscape. The lack of use trails for young riders (< legal driving age) is disgraceful. Provide opportunity. Open the roads on Bison for a limited time. FOIA – all correspondence with M.WA. and State of Montana. Keep access to Kading Grade. Historic use. Older hunters want to access Forbidden	(122-1) Refer to Alternative 5.

Comments	Response to Comments
Ridge + Upper drainages of Little Blackfoot. Respect 1986 decisions + those of PDRe II. (121-1) Thank you David Carroll POB 141 Elliston, MT 59728	
(123) From: Matt Christiansen [mailto:matt.christiansen.388@gmail.com] Sent: Thursday, June 12, 2014 5:42 PM To: FS-hlcplanrevision Subject: Forest Plan Revision Comments 12 June2014 To: the United States Forrest Service Re: Comments to the Continental Divide Travel Plan. I am Matt Christiansen, a resident in the Sweeney Creek neighborhood and reside at 7295 Priest Pass Rd. This is across the road from the “parking area” by the cattle guard crossing Priest Pass Rd. In recent years, this area has become a hotbed of recreational use and unfortunately, great abuse, of our public land in the Helena Regional Forrest. The proximity to town has made this an easy place practice behaviors that are not generally not acceptable in civilized society. It has become a dumping ground for trash, old furniture, appliances, carcasses, and what I assume to be waste oil. Where there were few roads and trails through the area, these have been multiplied into a senseless network of roads and it now has the look and use of a motocross track. Noxious weeds are now widely spread across the area and in spite of there being an abundance of dead standing wood in the area, each weekend morning we find the	(123-1) Thank you for your comments.

Comments	Response to Comments
remains of what were healthy living trees smoldering in the abandoned fires that burned the night before. This has become the party spot and on any weekend night the Sheriff and USFS law enforcement could cite dozens of illegal underage drinkers partying around the bonfires. Unfortunately, these fires are abandoned while still burning leaving all of us at great risk of a wildfire outbreak. Along with the noisy partying and drinking goes a lot of four-wheeling and "Mud-Bogging" throughout the night until dawn which destroys our sleep and further deteriorates the condition of the land and fauna. It is not uncommon to find an overturned vehicle up there or on the road leading to the area in the mornings, apparently the drivers too drunk to navigate even the graded roadways. I have seen several. With the Paint -Ballers and motorcycles there all day, and the trucks and partiers there all night there is no peace in what was once a peaceful neighborhood. And then there are the firearms and automatic weapons that are often in use in close proximity to homes and livestock. It is now often not safe to walk through the area because of the indiscriminate and irresponsible use of firearms. This is something that happens in the afternoons, after work when it would be nice to take the dogs for a walk, but is now not safe to do so. I have confronted some who are firing very close to our houses, some are reasonable and move on but others are not. As is so often the case, alcohol is involved and reason is not possible. I think it is time that something is done to bring this area back under the control of law and order and prevent the further abuse and degradation of the forest. Many of the residents here make trash runs through there after the parties to pick up the cans, bottles and other trash left behind but it is getting to the point that we can't keep up with it. It is not an occasional occurrence, it is constant. I use the forest myself to ride my own quad, collect firewood, walk my dogs and ride horses. I realize that restricting access and uses of this area impacts my own freedoms to enjoy and use our national heritage and public lands. I am however willing to give up that privilege in this case for the better good to be done by restricting this area. Most of	

Comments	Response to Comments
the real abuse seems to come along with vehicular access, which may be the simplest way to resolve the problem. I believe that option 3 of the Travel Plan does that and I urge the Forest Service to adopt that action for the common good and preservation of this portion of the Helena Regional Forest. Thank you, Matt Christiansen 406 442 6872	
(124) From: Jan Donaldson <jand1943@gmail.com> Sent: Thursday, June 12, 2014 10:19 AM To: FS-comments-northern-helena-helena Subject: Divide Travel Plan Attachments: letter to Helena Nat'l Forest re SweeneyCreek-Priest Pass Rd..doc Please accept the attached document re comments on the Divide Travel Plan. Jan Donaldson / Mary Anne Guggenheim 100 Stuart St. Helena, MT 59601 406-443-5006 JAN DONALDSON MARY ANNE GUGGENHEIM 100 Stuart St. Helena, Montana 59601 406-443-5006 JanD1943@gmail.com sweenycrik@gmail.com June 12, 2014	(124-1) Thank you for your comment.

Comments	Response to Comments
Helena National Forest ATTN: Divide Travel Plan 2880 Skyway Drive Helena, MT 59602 To Whom It May Concern: As residents on Priest Pass Road for over 20 years (1987-2010) we support Alternatives #3 and #4 of the Draft Divide Travel Plan. When we moved to Priest Pass Road, it had some recreational use from off road vehicles, but over those 20 years, the damage to natural resources, threats to wildlife habitat and destructive motorized trails multiplied. Noise from off road vehicles, and litter from users was clearly evident in all seasons. We strongly urge expansion of a non-motorized corridor from the ski trails on MacDonald pass north to Priest Pass and Mullan Pass, designating Sweeney Creek-Priest Pass Road as the year round motor vehicle route. It will take time and effort to mitigate the damage already present and we hope that rehabilitation will occur. The recreational potential of Sweeney Creek-Priest Pass as a non-motorized corridor is substantial and worth saving. We appreciate the opportunity to comment on this issue. Jan Donaldson Mary Anne Guggenheim	
(125) Dan Edens P0 Box 7569 Helena MT 59604 Please accept the following comments for the Divide Travel Plan Draft Environmental Impact Statement.	(125-1) Thank you for your comment.

Comments	Response to Comments
After reviewing the proposals, and the alternative plans, I note that FS Trail 227-B 1 would be opened for winter use by snowmobiles, in alternatives 2 ,3, and 4.. Currently trail 227 B-i is used for access to the Charter Oak Mine, and is closed year-round to motorized vehicle use, except for the occasional public tour. In the winter it is used by skiers and snowshoers. If changed to a snowmobile trail there would be, in my view, a conflict between the two uses. It could also lead to vandalism, and theft at the Charter Oak Mine Site. I also note in the alternatives the trails further up the mountain, 1857 A-3 and 1857 A-5 would be open to winter use by snowmobile. That particular area is frequently used in the winter time by wolverine and could possibly be used as den site. It also is used heavily by moose during the winter. I hope that your staff would take that information in consideration when making you decisions. Sincerely, Dan Edens	
(125b) June 12, 2014 RE: Divide Travel Plan Draft Environmental Impact Statement The Montana Trail Vehicle Riders Association (MTVRA) represents a mix of single, family, and business members as well as local OHV clubs and associations supporting responsible OHV use. MTVRA believes in fair, balanced and equitable	(125b-1) Thank you for your comment.

Comments	Response to Comments
solutions to the ongoing loss of the OHV opportunities. Our members live and work in Montana and recreate on public land on a regular basis MTVRA is recognized by State and Federal agencies as the state association representing off highway recreationists in Montana. The Great Falls Trail Bike Riders Association (GFTBRA) is a MTVRA charter club and represents the interests of motorcycle riders, ATV riders and snowmobilers recreating on the public lands throughout Montana. MTVRA and GFTBRA actively works to educate the public about good ethics and the responsible use of motorized vehicles on public and private lands. We believe in shared, multiple-use of public lands, with a reasonable balance between the protection of the natural resources and maintaining a variety of opportunities currently available to the people of Montana. We participate in local and state sponsored trail maintenance projects and have served as willing and committed partners to the multiple Forest Service Districts, The families and diverse groups of visitors to public lands are one of Montana's most valuable resources and thus deserve recognition and consideration. Comments on the DEIS: MTVRA and GFTBRA a5ks that the trail specific comments from OHV recreationists and CTVA be given consideration. These are the people that know the area and are familiar with the specific trails. MTVRA and GFTBRA asks that when developing the proposed action the OHV component in the proposal be considered as with a 'positive' attitude to the potential opportunities. This is a travel plan, not an 'eliminate motorized recreation'. Past USFS proposals and actions have recognized the cumulative affects the decisions have caused, including the pressure the closures put on existing areas with OHV trails, but do not examine or address solutions or opportunities available in	

Comments	Response to Comments
their action to mitigate the issues. Wildlife management never address the many areas where the numbers are at their 'objective' or over and have a history of 50+ years of motorized recreation. Many studies are ignored as they do not support the agency bias. To many, these managers appear to support elimination of motorized recreation while creating a larger herd that only supports the sale of hunting license. MIVRA and GFTBRA request a fair and balanced approach to OHV management for the Divide Area. We appreciate the opportunity to comment on proposed actions and thank you for your attention. Ramona Ehnes, Secretary/Treasurer for Montana Trail Vehicle Riders Association Ramona Ehnes Secretary/Treasurer for Great Falls Trail Bike Riders Association	
(126) From: Lloyd, Lisa [mailto:Lloyd.Lisa@epa.gov] Sent: Thursday, June 12, 2014 3:04 PM To: Degeest, Heather R -FS Subject: Divide Travel Plan DIES comment letter Heather, You cc of the letter is attached. It was mailed on 6/10/14. Let me know if you have any questions. Lisa Lloyd NEPA Program/Superfund Program U.S. EPA Region 8 (EPR-N) 1595 Wynkoop St. Denver, Colorado 80202-1129 (303) 312-6537	

Comments	Response to Comments
A book tightly shut is a but a block of paper. - Chinese Proverb UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8 1595 Wynkoop Street DENVER, CO 80202-1129 Phone 800-227-8917 http://www.epa.gov/region08 JUN 10 2014 1595 Wynkoop Street DENVER, CO 80202-1129 Phone 800-227-8917 http://www.epa.gov/region08 JUN 10 2014 Ref: 8EPR-N Bill Avery, Forest Supervisor Helena National Forest 2880Skyway Drive Helena, MT 5960 I Re: Divide Travel Plan Draft Environmental Impact Statement, CEQ # 20140069 Dear Mr. A very: The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Divide Travel Plan Draft Environmental Impact Statement (EIS) prepared by the	

Comments	Response to Comments
USDA Forest Service (USFS). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA). Section 309 of the Clean Air Act directs the EPA to review and comment in writing on the environmental impacts of any major federal agency action. As provided in more detail at the end of the letter, our review has resulted in a rating of EC-l (Environmental Concerns - Adequate Information). Project Background The Helena National Forest (HNF) is proposing changes to the existing system of designated motorized public access routes and prohibitions within the Divide travel planning area for wheeled and over-snow motorized vehicles. This Draft EIS describes the anticipated direct, indirect, and cumulative environmental impacts that would result from the proposed changes and from the three alternatives. The area this travel plan includes is approximately 155,500 acres of National Forest System (NFS) lands and lies within Lewis and Clark and Powell Counties in the state of Montana. The Divide Travel Plan Decision will include only open or closed determinations; decommissioning would not be specified in this decision. Any decommissioning action resulting from this planning decision would require additional NEPA analysis. None of the alternatives would prohibit non¬motorized activities. The proposed changes would determine where wheeled and over-snow motorized vehicles could access the Forest System roads and trails. Comments and Recommendations The EPA supports the HNF's efforts to analyze changes to the existing motorized public access routes within the Divide travel planning area for wheeled and over-snow motorized vehicles. We also understand the usefulness of being consistent with adjacent forest plans where roads connect. The Draft EIS appears to present	

Comments	Response to Comments
many trade-offs as related to potential environmental impacts. For instance, more roads will be open to motorized over-snow vehicles, but the time period for this type of motorized access will be shortened. In addition, a number of the roads being opened for this use are within areas where motorized over-snow vehicles are already allowed next to the roads. Therefore, our comments are focused on the broader water quality impact of the general actions. The Draft EIS states that there are no effects or no easily quantifiable indirect effects of the decision on water resources and no effort has been made to estimate sediment delivery from the road network under each alternative. The Draft EIS also recognizes that unpaved roads are a dominant source of sediment in streams and that roads crossing or running alongside streams generally deliver higher sediment to streams than roads without a hydraulic connection to a stream channel (page 148). As shown in Draft EIS Tables 3.19 and 3.20 there are a number of streams that have a large number of road crossings and many of these streams are already listed by the Montana DEQ as impaired due to sediment. We are concerned that there is appropriate monitoring of roads, especially the roads with numerous stream crossings, to determine when the road use has an increased negative impact on nearby streams. Additionally, we are concerned about whether there is sufficient maintenance of roads so as to limit the runoff and sedimentation impacts to nearby streams. (162-1) For instance, there are three roads that will remain closed until stream crossing bridges or culverts can be constructed. We recommend that the Final EIS indicate how the USFS will assure that these roads will not be used by motorized vehicles until this work is completed and indicate the plan for funding and constructing the needed bridges or culverts, including the time of such work. (126-2) We also recommend the Final EIS provide additional information on the monitoring of roads, such as the criteria used for evaluating the effects of motorized routes on water quality and any changes that may result from the change of uses outlined in	(126-1) Refer to the Hydrologist report. Monitoring will be designed prior to implementation. Refer to Alternative 5 regarding stream crossing exposure. (126-2) The timeline and guidelines for implementation will be designed at a later date, prior to implementation. (126-3) The Environmental Consequences section of the Hydrology Specialist Report details the potential benefits to water quality that could be initiated by closing hydraulically connected roads and provides recommendations for monitoring to prevent future negative impacts to water quality associated with forest roads. Although no road decommissioning is proposed in the scope of the Divide Travel Plan, this action sets up the potential for roads with water quality issues to be reclaimed in future projects. Please see the Transportation Specialist Report for maintenance levels under each alternative

Comments	Response to Comments
the Draft EI8. The Final EIS could also provide more clarity on the mitigating measures the USFS has already implemented, or will implement, to minimize the sedimentation impact to streams. (126-3) The EPA supports the USFS in moving forward with the decommissioning of closed roads to remove them from the landscape, which should have a positive impact on streams near these roads. Additionally, we encourage the USFS to take steps to prevent the use of the roads and trails not designated as system routes and move these unauthorized routes into decommissioning. Rating Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, the EPA is rating this Draft EI8 as Environmental Concerns-Adequate Information, (EC-l). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The" 1" rating means the Draft EIS provides adequate information and analyses to disclose project impacts. A full description of the EPA's rating system can be found at: htlp:llwww.epa.gov/compliance/nepafcomrnents/ratings.html. If you have any questions or would like to discuss our concerns in more detail, please contact me at (303) 312-6704. You may also contact Lisa Lloyd, NEPA lead reviewer, at (303) 312-6537 or by email at lloyd.lisa@epa.gov. Sincerely, Philip S. Strobel Acting Director, NEPA Compliance and Review Program Office of Ecosystems Protection and Remediation	intended to minimize impacts to water quality.

Comments	Response to Comments
Ecc: Heather DeGeest, USFS	
(127) From: Susan Epstein <shrop@mt.net> Sent: Thursday, June 12, 2014 8:38 AM To: FS-comments-northern-helena Subject: Continental Divide National Scenic Trail To Helena District Ranger Heather DeGeest: I urge you to fully protect the Continental Divide Trail and surrounding wildlands by adopting Alternative #3 and the CDT corridor protections. The plan should include protections for Nevada Mountain and all Little Blackfoot roadless lands. (127-1) Thanks for your consideration. Susan Epstein shrop@mt.net P.O. Box 27 Fort Harrison , MT 59636	(127-1) Refer to Alternative 5.
(128) From: william fairbank <williamfairbank@mac.com> Sent: Thursday, June 12, 2014 11:13 AM To: FS-comments-northern-helena-helena Subject: Divide Trail Please don’t allow any new motorized traffic on the trails. I like to hike and ski and I am tired and disturbed to see the damage done by off road atv etc. They can’t seem to stay on any set trails and also dig up the trail.	(128-1) Thank you for your input.

Comments	Response to Comments
Bill Fairbank 435-215-9576	
(129) From: Michael Garrity <wildrockies@gmail.com> Sent: Thursday, June 12, 2014 10:32 AM To: FS-comments-northern-helena-helena Subject: Divide Travel Plan Attachments: Divide Travel Plan DEIS comments HNF 6-12-14.doc; Wolverine Guidance R1.pdf June 12, 2014 Heather DeGeest, Ranger Helena Ranger District Helena National Forest 2880 Skyway Drive Helena, MT 59602 RE: Comments on the Draft Environmental Impact Statement (DEIS) for the Divide Travel Plan Dear Ranger Degeest; Thank you for this opportunity to comment on the Divide Travel Plan DEIS. Please accept these attached comments in MS Word and an attachment in pdf format from the Alliance for the Wild Rockies, native Ecosystems Council and Montana Ecosystems Defense Council. Thank you for considering our comments. Sincerely yours,	

Comments	Response to Comments
/s/ Michael Garrity Alliance for the Wild Rockies P.O. Box 505 Helena, Montana 59624 406-459-5936 And for Sara Johnson Native Ecosystems Council P.O. Box 2171 Willow Creek, MT 59760 And for Steve Kelly Montana Ecosystem Defense Council P.O. Box 4641 Bozeman, MT 59772 June 12, 2014 Heather DeGeest, Ranger Helena Ranger District Helena National Forest 2880 Skyway Drive Helena, MT 59602 RE: Comments on the Draft Environmental Impact Statement (DEIS) for the Divide Travel Plan	

Comments	Response to Comments
Dear Ranger Degeest; Thank you for the opportunity to comment on the Divide Travel Plan DEIS. We believe the Divide Travel Plan Project DEIS analyses of impacts on water quality are inadequate.(129-1) The Divide Travel Plane DEIS fails to facilitate recovery of bull trout and maintains degraded conditions in bull trout critical habitat in violation of the Endangered Species Act. (129-2) The DEIS does a good job describing the needs and threats to bull trout and bull trout habitat but the Forest Service and U.S. Fish and Wildlife Service: 1) failed to take a hard look at all of the Project impacts on bull trout and westslope cutthroat trout, 2) failed to ensure bull trout and westslope cutthroat trout survival and recovery, and 3) failed to ensure a viable population of bull trout and westslope cutthroat trout (WCT), in violation of the Helena National Forest Plan, ESA, NFMA and NEPA. (129-3) Bull trout are listed as a threatened species under the ESA. WCT is designated as a Sensitive Species by the U.S. Forest Service (USFS), and a Special Status Species by the Bureau of Land Management (BLM). The Endangered Species Act requires that all Federal departments and agencies shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes of this Act. The terms “conserve”, “conserving”, and “conservation” mean to use and the use of all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this Act are no longer necessary. Agencies did not analyze or disclose current condition of the INFISH Riparian	(129-1) The Hydrology Specialist Report discusses the water quality of streams impacted by this decision using current available data, including water quality reports published by the EPA and monitoring performed by Forest Service hydrology staff. The water quality analysis in the Hydrology Specialist Report used riparian habitat conservation areas specified by INFISH standards intended to protect bull trout. Please see the Fisheries Specialist Report for further discussion of impacts on fish habitat. (129-2,129-3)The DEIS discusses the threats to bull trout and westslope cutthroat trout habitat on pages 10 – 18 with special attention given the spawning and rearing needs of salmonids. Given its purpose to make an administrative decision to designate routes as open or closed to motorized use, the scope of the project is not focused on fish habitat recovery. However, coordination with fisheries and watershed specialist in the development of the project proposal and all its alternatives focused on roads to close that likely affect fish habitat and water quality. The fish report for the FEIS concludes that Alternatives 3 and 5 would result in closing 21.3 miles and 29.2 miles respectively of roads deemed high risk to fish habitat in the project area. Additionally, 46 more crossing under alternative 3 and 67 crossings under Alternative 5 would be closed. This decision, therefore, sets the stage for fish habitat improvement projects under a separate analysis. By doing so, this then serves to improve and protect salmonid habitat thereby minimizing ongoing impacts from the transportation system on the viability of native species. Follow up formal bull trout consultation with the USFWS is expected to result in terms and condtions outlined

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Management Objectives (Large Woody Debris, Bank Stability, Lower Bank Angle and Width/Depth Ratio); those that are disclosed (Temp, Pools, Sediment) are in abysmal shape. Nor did agencies disclose how this Project would the necessary improvements to meet PACCFISH/INFISH Objectives. (129-4) The Ninth Circuit has also held that the agency must make clear when information is lacking, and "[g]eneral statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided." Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1213 (9th Cir. 1998); Montana Wilderness Association v. McAllister, 666 F.3d 549 (9th Cir. 2011). The Ninth Circuit has also made it clear that a cursory cumulative impact analysis does not pass muster under NEPA. Lands Council, 395 F.3d at 1026-27; Ocean Advocates v. U.S. Army Corps of Engineers, 402 F.3d 846, 868 (9th Cir. 2005); Neighbors of Cuddy Mountain v. USFS, 137 F.3d 1372, 1379-80 (9th Cir. 1998). The agencies failed to use the best available science in violation of the ESA and NEPA. The Forest Service has very limited information on the status of the highly imperiled bull trout population in the Project area. The limited information that the Forest Service does have in making its habitat determinations is not current and is unreliable. The streams in the Divide Travel Plan project area mostly functioning at risk or functioning at unacceptable risk. This project maintains degraded conditions for subpopulations size, growth and survival, life history diversity and isolation, persistence and genetic integrity, substrate embeddedness, large woody debris, pool frequency and quality, large pools, refugia, width to depth ratio, bank stability, change in peak/base flows, drainage network increase, road density and location, disturbance history, temperature, and integration of species and habitat concerns. This project further degrades sediment levels.(129-5) The Forest Service has failed to take a hard look at Project effects on bull trout and WCT, has failed to use the best available science, and has failed to base its determinations on readily-available substantial supporting evidence, in violation of	to address roads having adverse effects on salmonid fish habitat west of the Divide. (129-4) INFISH Riparian Management Objectives (RMOs) are covered under the Bull Trout BA for formal consultation with the USFWS. These interim RMOs can vary across geographic areas and are regarded as only representative of a starting point without site specific analysis. Importantly, INFISH RMOs do not include sediment levels in fish reproductive habitat, which is the key habitat feature most influenced by the transportation system . Therefore, the bull trout Biological Analysis would likewise focus on channel bottom sediment conditions because these habitat attribute are most sensitive to the matter of high risk roads and crossings subject to an administrative decision on which roads are to be open or closed. (129-5) The analysis is solidly grounded on best science derived from accepted scientific and administrative methodologies. We believe we have applied the best relevant science in the fisheries analysis [see the Fisheries Background Report “References Cited” and Information Used/Methodology sections]. We used this information in conjunction with maps of fisheries and transportation system to help discern which routes presented highest risks to fish and need to be closed, rather than simply closing roads to reduce overall open route density. Over 25 years of extensive fishery sampling efforts has found the decline of bull trout in the area most likely due to hybridization and competition with non-native brook trout , and possibly predation by brown trout in the mid to lower reaches of the Little Blackfoot River off forest where less than optimum water temperatures occur.

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the APA, ESA and NEPA. The agencies are not meeting Helena Forest Plan requirements for viability, in violation of NFMA. (129-6)	(129-6) Please refer to reply indexed at 129-5.
"It is anticipated that this project would not result in a "Likely to Adversely Affect" determination for bull trout consultation. No determination is made in the DEIS about whether or not bull trout, or westslope cutthroat trout, populations are viable at the Project level, watershed scale, or on the Helena National Forest, in violation of the NFMA and ESA. The agencies are not meeting recovery requirements for bull trout/westslope cutthroat trout, in violation of the ESA. Recovery standards, goals and objectives are not being met. The Project fails to contribute to the recovery of bull trout and/or westslope cutthroat trout. (129-7) By authorizing this project the Helena N.F. is not facilitating recovery of nor "conserving" bull trout in the project area and is instead either maintaining or further degrading bull trout habitat.	(129-7) Table 5 (pg 28) specifies a determination of "Likely to Adversely Affect" for bull trout as a function of the existing transportation system in the context of other cumulative landuse activities. This requires the Forest to formally consult with the USFWS as directed in the 1998 Biological Opinion (BO) for continued implementation of Forest Service Land and Resource Management Plans. The 1998 BO states: "where proposed actions likely adversely affect bull trout…the Service will need to identify measures, associated terms and conditions, and prepare a BO to conclude formal consultation (USDI 1998 page 93). Westslope cutthroat trout, although poorly distributed on the east side of the Divide (5.5% of occupied habitat), account for 98% of occupied habitat west of the Divide (pg 12 of DEIS) with road closure provisions to protect local populations.
The impact of the intense sedimentation predicted across much of the watershed is significant and substantial on fish populations. (129-8) Fish suffer many effects from increased sedimentation. These effects range from physiological and behavioral, where gills are injured by the passage of a high volume of abrading sediment and foraging habits altered or interfered with due to changes in visibility in the water, to the actual death of fish. Bull trout are very sensitive to sediment. Their fry and juvenile stages, those that rely on interstitial habitats within the stream gravels for protection from predators and adequate food and oxygen, suffer higher mortality as sediment increases. Westslope cutthroat are also noted to be sensitive to sediment for much the same reasons. Thus, the cold water fishery beneficial use is further damaged and results in a CWA violation.	(129-8) This analysis does not model sediment predictions across watersheds as no construction or decommissioning of roads will occur under this project. However, sediment levels in salmonid spawning habitats have been semi-quantified using McNeil core sampling methodologies to assess existing sediment levels in bottom substrates for select streams; results are outlined on page 31 of the DEIS.
The DEIS does not model retention, which is key to estimating the impact on fish population health in the creek. In essence, it only models the sediment coming into the stream and ignores the length of time it might continue to degrade water quality and fish habitat. Even so, any increase measurable in tons that is not related to an	(129-9) No sediment modelling or other modelling is used for this analysis as no ground disturbing activities are proposed. Such modelling may be applied for an implementation action that subsequently follows this project, This project serves only to

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ultimate reduction in sediment load (as road work is) is a violation of the Clean Water Act by interfering with the attainment of beneficial uses in WQLS streams. (129-9)	designate which roads are open or closed.
Please consider not authorizing wheeled motorized vehicle travel for dispersed camping or parking within 300 feet of all designated system roads as the DEIS points out this harms bull trout and bull trout habitat. (129-10)	(129-10) Refer to Alternative 5.
The FS is not allowed to undertake activities that increase the risk of extinction for bull trout, a federally listed Threatened species or west slope cutthroat trout a sensitive species. Moreover, bull trout in the project area watershed are at extreme risk of extinction. In combination with heavy past heavy logging, road building, past prescribed burning and past mining, the cumulative effects prohibit a new activity of the scope that would be authorized by the decision memo. The Forest Service and the Fish and Wildlife Service are required by the ESA to recover populations not maintain them at extreme risk of extinction.	
This area is habitat for bull trout. Please formally consult with the U.S. Fish and Wildlife Service and about the impacts on bull trout and bull trout critical habitat. The biological assessment must be available for the public to comment on before a decision is signed or the project is in violation of NEPA. (129-11)	(129-11) As required under section 7 of the Endangered Species Act and the 1998 Biological Opinion for continued implementation of Forest Service Land and Resource Management Plans, this project will undergo formal consultation with the U.S. Fish & Wildlife Service.
The agency has not used the best available science in project analysis. (129-12)	
Is there any bull trout critical habitat in the project area? If so, please re-initiate a programmatic consultation with the U.S. Fish and Wildlife Service on PACFISH/INFISH in Bull Trout Critical Habitat since critical habitat for bull trout was designated after PACFISH and INFISH were adopted and the impact of these standards on bull trout critical habitat have not been assessed. PACFISH and INFISH were adopted before bull trout were listed so the Forest Service needs to reinitiate a programmatic consultation on PACFISH/INFISH effect on bull trout.	(129-12) We believe we have applied the best relevant science in the fisheries analysis [see the Fisheries Background Report “References Cited” and Information Used/Methodology sections]. We used this information in conjunction with maps of fisheries and transportation system to help discern which routes presented highest risks to fish and need to be closed.

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This consultation must also be available for the public to comment on before a decision for this Project is signed. The DEIS does not disclose how this project supposed improvements meet INFISH objectives. (129-13) According to the USFWS, four elements are necessary to asses long-term viability (extinction risk) of bull trout populations: 1) the number of local populations, 2) adult abundance, 3) productivity (reproductive rate), and 4) connectivity (presence of migratory life history form). The DEIS fails to address any of the above parameters either at the project level or the watershed level. Nor has the agency provided documentation or discussion of the impacts threshold that the local bull trout population can sustain. Please fix this. (129-14) The DEIS did not adequately examine the cumulative impacts on bull trout from grazing, it did not demonstrate that it consider the significant grazing impacts in this watershed. A 2013 BiOp for the Mill Creek grazing allotment in the Salmon N.F. admits that cattle will trample up to 16 bull trout redds annually, plus cause significant habitat degradation such as sedimentation. The DEIS did not show that the Forest Service consider this. This is a violation of NEPA, NFMA, the Clean water Act, the APA and the ESA. There is an inadequate analysis on the cumulative impacts on streams and bull trout and bull trout critical habitat from motorized use. There is also an inadequate direct and cumulative impacts analysis on bull trout from brook trout. (129-15) The DEIS did show that the Forest Service considered brook trout expansion. Sedimentation and high temperatures exacerbate brook trout expansion, because brook trout are more tolerant of poor water quality. There is also an inadequate Cumulative impacts analysis on Bull Trout from all past, present and future HNF timber sales in the watershed in violation of NEPA, NFMA, the APA and the ESA (129-16) One of the major contributors to aquatic habitat degradation in the project area is the high road density and this project will allow the Forest Service to build more roads	(129-13) In 2010, the USFWS issued their final designation for bull trout critical habitat [Federal Register 75:63898-64070]. The Little Blackfoot River from its mouth to its headwaters sources is not designated critical habitat under the 2010 bull trout critical habitat listing rule. Regarding INFISH RMOs, this project is meant to only designate open or closed motorized routes; decommissioning would not be specified in this decision (129-14) Restoration of bull trout habitat is not the purpose of this travel plan project. However, the fisheries specialist assigned on the project screened roads deemed most important to close to helpprotect or recover RMOs under INFISH. (129-15) Appendix C of the fish report incorporates all grazing allotments that potentially contribute sediment to occupied bull trout habitat. All allotments in the planning area have been previously consulted on with the USFWS following the species initial listing in 1998. A detailed analysis of threats to bull trout have been reserved for the Biological Analysis, which includes consideration for brook trout and brown trout hybridization, competition, and predation. Declines of bull trout in the Little Blackfoot drainage are further addressed in the FEIS report giving weight to non-native species interactions and temperature regimes, especially influential downstream of the forest. (129-16) Timber harvest has been considered more thoroughly for cumulative effects in the FEIS. The FEIS identifies past harvest activities that were missing in the DEIS. To help assess cumulative impacts from past and ongoing activities, including timber harvest, the principle of fine sediment sampling in response reaches of streams in the travel plan area is discussed

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and skid trails. The disclosure of current road density (including total, open, closed) and project and post project densities (including temporary roads needed to facilitate logging activities) is not clear in the DEIS how sedimentation from haul routes will impact stream quality. Vehicle operations on roads generate sediment and a wide variety of trace metals and hydocarbons that contaminate road surfaces. (129-17, 129-18) It does appear clear that nearly all of the sub watersheds are functioning at an unreasonable risk due to road densities. Because road density is such an important factor in habitat quality for aquatic and many terrestrial species, disclosure and analysis of road density percentages before, during, and after project implementation is imperative as well as compliance with the Forest Plan road density standards. (129-19) The Forest Service and U.S. Fish and Wildlife Service: 1) failed to take a hard look at Project impacts on bull trout and westslope cutthroat trout, 2) failed to ensure bull trout and westslope cutthroat trout survival and recovery, and 3) failed to ensure a viable population of bull trout and westslope cutthroat trout (WCT), in violation of the Helena National Forest Plan, ESA, NFMA and NEPA. (129-20) Bull trout is listed as a threatened species under the ESA. WCT is designated as a Sensitive Species by the U.S. Forest Service (USFS), and a Special Status Species by the Bureau of Land Management (BLM). Weeds Native plants are the foundation upon which the ecosystems of the Forest are built, providing forage and shelter for all native wildlife, bird and insect species, supporting the natural processes of the landscape, and providing the context within which the public find recreational and spiritual opportunities. All these uses or	on pages 196-201 of the DEIS and is carried forward in the FEIS. (129-17) This comment is out of the scope of this project as the project does not propose to build any roads. (129-18) The approach to assess the stream-road relationship, including sedimentation from roads, is discussed on pages 164-165, 181-189, and 190-195 in the DEIS. The subject of "haul routes" is irrelevant to this project as it is not a timber sale or hazardous material removal project. (129-19) The fisheries analysis focuses on roads in the INFISH RHCA and all crossings to assess road risk, and not on road density because most roads do not affect streams, especially those on ridges and in upland terrain. The Methodology section (pgs 164-5) in the DEIS explains the approach to evaluating the road-stream relationship under this open/closed roads administrative decision. (129-20) The Biological Analysis and consultation with USFWS is the platform for considering a comprehensive approach to impacts on bull trout; not the DEIS. Potential effects to westslope cutthroat trout are addressed in a separate Biological Evaluation on the basis of the selected alternative. Recovery for bull trout is formalized under the 2014 USFWS Revised Draft Recovery Plan for Bull Trout, which builds upon new information and studies about bull trout and revised recovery criteria from earlier plans. In support of the the 2014 USFWS Bull Trout Recovery Plan for USFS lands in western Montana, a USDA Bull Trout Conservation Strategy has been developed to help the FS address Forest Plan amendment requirements under INFISH and provide a framework for planning and implementing

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values of land are hindered or lost by conversion of native vegetation to invasive and noxious plants. The ecological threats posed by noxious weed infestations are so great that a former chief of the Forest Service called the invasion of noxious weeds "devastating" and a "biological disaster." Despite implementation of Forest Service "best management practices" (BMPs), noxious weed infestation on the Forest is getting worse and noxious weeds will likely overtake native plant populations if introduced into areas that are not yet infested. The Forest Service has recognized that the effects of noxious weed invasions may be irreversible. Even if weeds are eliminated with herbicide treatment, they may be replaced by other weeds, not by native plant species. Invasive plant species, also called noxious weeds, are one of the greatest modern threats to biodiversity on earth. Noxious weeds cause harm because they displace native plants, resulting in a loss of diversity and a change in the structure of a plant community. By removing native vegetative cover, invasive plants like knapweed may increase sediment yield and surface runoff in an ecosystem. As well knapweed may alter organic matter distribution and nutrient through a greater ability to uptake phosphorus over some native species in grasslands. Weed colonization can alter fire behavior by increasing flammability: for example, cheatgrass, a widespread noxious weed on the Forest, cures early and leads to more frequent burning. Weed colonization can also deplete soil nutrients and change the physical structure of soils. The Forest Service's own management activities are largely responsible for noxious weed infestations; in particular, logging, prescribed burns, and road construction and use create a risk of weed infestations. The introduction of logging equipment into the Forest creates and exacerbates noxious weed infestations. The removal of trees through logging can also facilitate the establishment of noxious weed infestations because of soil disturbance and the reduction of canopy closure In general, noxious weeds occur in old clearcuts and forest openings, but are rare in mature and old growth forests. Roads are often the first place new invader weeds are introduced. Vehicle traffic and soil disturbances from road construction and maintenance create	actions to improve local bull trout habitat and populations. This travel plan serves to meet elements of these recovery documents by closing roads that risk impacts to bull trout habitat or identify those kept open in need of mitigation or measures to eliminate their impacts.

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ideal establishment conditions for weeds. Roads also provide obvious dispersal corridors. Roadsides throughout the project area are infested with noxious weeds. Once established along roadsides, invasive plants will likely spread into adjacent grasslands and forest openings. The DEIS did not address the ecological, social and ascetic impact of current noxious weed infestations within the project area. Include an analysis of the impact of the actions proposed by this project on the long and short term spread of current and new noxious weed infestations.What treatment methods will be used to address growing noxious weed problems? What noxious weeds are currently and historically found within the project area? Please include a map of current noxious weed infestations which includes knapweed, Saint Johnswort, cheat grass, bull thistle, Canada thistle, hawkweed, hound's-tongue, oxeye daisy and all other Category 1, Category 2 and Category 3 weeds classified as noxious in the MONTANA COUNTY NOXIOUS WEED LIST. State-listed Category 2 noxious weed species yellow and orange hawkweeds are recently established (within the last 5 to 10 years) in Montana and are rapidly expanding in established areas. They can invade undisturbed areas where native plant communities are intact. These species can persist in shaded conditions and often grow underneath shrubs making eradication very difficult. Their stoloniferous (growing at the surface or below ground) habit can create dense mats that can persist and spread to densities of 3500 plants per square mile (Thomas and Dale 1975). The DEIS does not adequately address the issue of weeds in violation of NFMA and NEPA and the Forest Plan. (129-21) The DEIS does not address the cumulative, direct and indirect effects of the proposed project on weed introduction, spread and persistence that includes how weed infestations have been and will be influenced by the following management actions: road construction including new permanent and temporary roads, and skid trails proposed within this project area; opening and decommissioning of roads represented on forest service maps; ground disturbance and traffic on forest service template roads, mining access routes, and private roads; removal of trees through commercial and pre-commercial logging and understory thinning; and prescribed	(129-21) Refer to Weeds Specialsit report PG 12 -13 Current weed management activities would continue under all alternatives. Chemical weed treatments would be used in areas accessible to ground spraying equipment. Roadside infestations would be treated on a scheduled basis. Bio-control would be used in areas where the biological agents had optimal conditions for survival and expansion. In riparian areas, biological control would be emphasized where conditions for insect establishment are met. Weeds could be expected to increase by an estimated 14% without disturbance (Asher and Spurrier 1998). The most susceptible forest habitat types would be dry habitat types that have existing infestations of noxious weeds due to the natural openness of such forest types. Refer to Weeds Specialist report PG 5 – Various methods of weed control are used. Herbicide application is the most common form of control used in the project area. This analysis tiers to the HNF Weed Treatment Project FEIS (USDA 2006) which provides environmental requirements and guidelines regarding noxious weed treatment and herbicide effects. The Forest treats approximately one-third of the mapped weed on an annual basis under the normal weed treatment program. The areas scheduled for treatment in a given year are a combination of: acres associated with projects with ground disturbing activities; travel and recreation corridors; and re-treatment of existing infestations. Effectiveness monitoring is used to prioritize the roads and polygons that need re-treatment. Results of spray effectiveness monitoring are located in records kept by the Forest weed specialist. Refer to Weeds Specialist report PG 8 – Mapped Noxious Weed Infestations within the proposed project area. Primary Noxious Weed Species | Infested

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burns. The DEIS does not adequately discuss what open, gated, and decommissioned Forest Service roads within the project area proposed as future haul routes or motorized use have existent noxious weed populations and what methods will be used to assure that noxious weeds are not spread into the proposed action units.(129-22) Noxious weeds are not eradicated with single herbicide treatments. A onetime application may kill an individual plant but dormant seeds in the ground can still sprout after herbicide treatment. Thus, herbicides must be used on consistent, repetitive schedules to be effective. The EA does not commitment to a long-term, consistent strategy of application is being proposed for each weed infested area within the proposed action area in violation of NEPA and NFMA. The EA does not discuss what long term monitoring of weed populations is proposed. (129-23) When areas treated with herbicides are reseeded on national forest land, they are usually reseeded with exotic grasses, not native plant species. The EA does not discuss what native plant restoration activities will be implemented in areas disturbed by the actions proposed in this project. The EA adequately discuss howl disturbed areas including road corridors, skid trails, and burn units be planted or reseeded with native plant species. (129-24) The scientific and managerial consensus is that prevention is the most effective way to manage noxious weeds. The Forest Service concedes that preventing the introduction of weeds into uninfested areas is “the most critical component of a weed management program.” The Forest Service’s national management strategy for noxious weeds also recommends “develop[ing] and implement[ing] forest plan standards . . . .” and recognizes that the cheapest and most effective solution is prevention. The EA does not adequately discuss which units within the project area currently have no noxious weed populations within their boundaries or what minimum standards are in the Helena National Forest Plan to address noxious weed infestations. The Divide Travel Plan DEIS did not include an alternative in that includes land management standards that will prevent new weed infestations by	<table><tr><th></th><th>Acres</th></tr><tr><td>Spotted knapweed (Centaurea maculosa)</td><td>1729</td></tr><tr><td>Canada thistle (Cirsium arvense)</td><td>1312</td></tr><tr><td>Leafy spurge (Euphorbia esula)</td><td>34</td></tr><tr><td>Orange hawkweed (Hieracium aurantiacum)</td><td><1</td></tr><tr><td>Oxeye daisy (Leucanthemum vulgare)</td><td>21</td></tr><tr><td>Dalmation toadflax (Linaria dalmatica)</td><td>17</td></tr><tr><td>Sulfur cinquefoil (Potentilla recta)</td><td>65</td></tr><tr><td>Total Acres</td><td>3178</td></tr></table>Refer to Weeds Specialist report PG 9 – Map of project area with mapped weeds above table of weeds. The DEIS discusses invasive plant species currently included on the Montana state noxious weed list included priority 2 a and b species. We concur with your assessment of Yellow and orange hawkweed which is consistent with what we provided in the DEIS on Page 12. The National Forest Management Act of 1976 and the National Environmental Policy Act of 1970 are aimed at the decision making process. Both require a systematic and interdisciplinary approach to resource management as well as public involvement. Noxious weeds have been analyzed within the Divide Travel Plan Environment Impact Statement (EIS). Please refer to Weeds Specialist report PG 24 and 25 for the analysis of noxious weeds as they pertain to the proposed action and alternatives. Included in the EIS are proposed design elements intended as best management practices. Please refer to pages 3 and 4 for a complete list of design elements that would be employed for this project. (129-22) The purpose and need of the Divide Travel Plan EIS is “is to provide a manageable system of designated public motorized access routes and areas within the Divide area,

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addressing the causes of weed infestation. The failure to include preventive standards violates NFMA, APA and MUSY because the Forest Service is not ensuring the protection of soils and native plant communities. Additionally, the omission of an alternative that includes preventive measures would violate NEPA because the Forest Service failed to consider a reasonable alternative. (129-25) Rare Plants The ESA requires that the Forest Service conserve endangered and threatened species of plants as well as animals. In addition to plants protected under the ESA, the Forest Service identifies species for which population viability is a concern as "sensitive species" designated by the Regional Forester (FSM 2670.44). The response of each of the sensitive plant species to management activity varies by species, and in some cases, is not fully known. Local native vegetation has evolved with and is adapted to the climate, soils, and natural processes such as fire, insect and disease infestations, and windthrow. Any management or lack of management that causes these natural processes to be altered may have impacts on native vegetation, including threatened and sensitive plants. Herbicide application – intended to eradicate invasive plants – also results in a loss of native plant diversity because herbicides kill native plants as well as invasive plants. Although native species have evolved and adapted to natural disturbance such as fire on the landscape, fires primarily occur in mid to late summer season, when annual plants have flowered and set seed. Following fall fires, perennial root-stocks remain underground and plants emerge in the spring. Spring and early summer burns could negatively impact emerging vegetation and destroy annual plant seed. The DEIS does not adequately examine what threatened, endangered, rare and sensitive plant species and habitat are located within the proposed project area in violation of the ESA, NEPA, the APA and NFMA. The standards used to protect threatened, rare, sensitive and culturally important plant species and their habitats from the management actions proposed in this project are inadequate.	consistent with and to achieve the purposes of Forest Plan and travel management regulations at 36 CFR part 218 and 219." cumulative, direct and indirect effects of the proposed project that is consistent with that purpose and need have been analyzed within the EIS. Please refer to Weeds Specialist report PG 13-16 for the analysis of direct, indirect and cumulative effects as they pertain to noxious weeds associated with this project. (129-23) This analysis tiers to the HNF Weed Treatment Project FEIS (USDA 2006) which provides environmental requirements and guidelines regarding noxious weed management. Management measures included in the HNF Weed Treatment Project FEIS include inventory, treatment and monitoring as well as herbicide effects. (129-24) Refer to Weeds Specialist report Pg 3-4 Design Elements, refer to (129-23) response to comments. (129-25) The purpose and need of the Divide Travel Plan EIS is "is to provide a manageable system of designated public motorized access routes and areas within the Divide area, consistent with and to achieve the purposes of Forest Plan and travel management regulations at 36 CFR part 218 and 219."Helena Forest Plan II/22 – Forest – Wide Standards, Noxious Weeds 1. Implement an integrated weed control program in cooperation with the state of Montana and County Weed Boards to confine present infestations and preent establishing new areas of noxious weeds. Noxious weeds are listed in the Montana Weed Law and designated by County Weed Boards. 2. Integrated Pest Management, which uses chemical, biological, and mechanical methods, will be the principal control

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Management Standard C-2(2) and C-2(13) requires the Forest Service to conduct biological evaluations for T&E species and assess potential for suitable habitat prior to surface disturbing activities. The FS did not conduct biological evaluations for all sensitive and T&E plant species and is therefore in violation of the Forest Plan. Failing to survey or Threatened, Endangered, and Sensitive plants also violates NEPA. 40 C.F.R. § 1502.15 requires the agency to gather baseline information and address direct impacts: The environmental impact statement shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under consideration. The descriptions shall be no longer than is necessary to understand the effects of the alternatives. Data and analyses in a statement shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or simply referenced. Agencies shall avoid useless bulk in statements and shall concentrate effort and attention on important issues. Verbose descriptions of the affected environment are themselves no measure of the adequacy of an environmental impact statement. NEPA clearly requires that consideration of environmental impacts of proposed projects take place before a final decision is made. LaFlamme v. FERC, 842 F.2d 1063, 1071 (9th Cir.1988) (emphasis in original). Without establishing the baseline conditions which exist in the vicinity of the project before it begins, there is simply no way to determine what effect the proposed project will have on the environment and, consequently, no way to comply with NEPA. Half Moon Bay Fishermans' Marketing Ass'n, 857 F.2d at 510. An EA may be found inadequate under NEPA if it does not reasonably [set] forth sufficient information to enable the decisionmaker to consider the environmental factors and make a reasoned decision. Id. at 508, citing Oregon Environmental Council v. Kunzman, 817 F.2d 484, 493 (9th Cir.1987).	method. Spot herbicide treatment of identified weeds will be emphasized. Biological control methods will be considered as they become available. 3. Funding for weed control on disturbed sites will be provided by the resource which causes the disturbance.

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LYNX The Endangered Species Act requires the FS to insure that the Divide Travel Plan project is not likely to result in the destruction or adverse modification of critical habitat. 16 U.S.C. §1536(a)(2). Activities that may destroy or adversely modify critical habitat are those that alter the physical and biological features to an extent that appreciably reduces the conservation value of critical habitat for lynx. 74 Fed. Reg. 8644. The Forest Service must comply with the Northern Rockies Lynx Management Direction (NRLMD). Because of instructions in the Northern Rockies Lynx Management Direction appeal decision the Forest Service is required to consult with the United States Fish and Wildlife Service (USFWS). The Forest Service did not consult with the USFWS regarding lynx, which is a violation of the Endangered Species Act. The NRLMD as applied in the Divide Travel Plan project violates the ESA by failing to use the best available science to insure no adverse modification of critical habitat. The Forest Service must consult on the NRLMD in lynx critical habitat before this project can be approved. (129-28) The NRLMD carves out exemptions from Veg Standards S1, S2, S5, and S6. In particular, fuel treatment projects may occur in the WUI even though they will not meet standards Veg S1, S2, S5, or S6, provided they do not occur on more than 6% of lynx habitat on each National Forest. See NRLMD ROD, Attachment 1, pages 2-3. Allowing the agency to destroy or adversely modify any lynx critical habitat has the potential to appreciably reduce the conservation value of such habitat. The agency cannot simply set a cap at 6% forest-wide without looking at the individual characteristics of each LAU to determine whether the project has the potential to appreciably reduce the conservation value. The ESA requires the use of the best available science at the site-specific level. It does not allow the agencies to make a gross determination that allowing 6% of lynx critical habitat to be destroyed forest-wide will not appreciably reduce the conservation value.	(129-26) All alternatives of the Divide Travel Plan comply with all standards and guidelines of the NRLMD [Wildlife Background Report, p. 203 (129-27) The ESA does not require, nor does it desire that the Forest Service consult on multiple alternatives in NEPA documents. Consultation applies only to the final decision (as presented in the ROD). In this case, a Biological Assessment (BA) will be prepared and submitted to the USFWS once a decision has been developed. This is the standard form of informal consultation between the Forest Service and the USFWS that has been ongoing since the inception of the Endangered Species Act. Informal consultation is appropriate, since the BA will follow the EIS in concluding that the Travel Plan “may affect but is not likely to adversely affect” the lynx [Wildlife Background Report, p. 194-201, 203-204]. (129-28) No alternative in the Travel Plan proposes to alter vegetation. The VEG standards in the NRLMD do not apply. The guidelines that are potentially relevant are HU-G6 through HU-G12, which address travel management. The implications of Travel Plan alternatives with regard to open roads, habitat connectivity, and snow compaction are discussed in Wildlife Background Report (p. 192-201). There would be no negative impact on the primary constituent elements (PCEs) of lynx critical habitat (p. 197-198). See also p. 91-92.

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The FS also states that the project will result in disturbance to lynx in the project area and that lynx will move to an undisturbed area of the home range during project implementation. In December 1999, the Forest Service and Bureau of Land Management completed their "Biological Assessment Of The Effects Of National Forest Land And Resource Management Plans And Bureau Of Land Management Land Use Plans On Canada Lynx" (Programmatic Lynx BA). The Programmatic Lynx BA concluded that the current programmatic land management plans "may affect, and are likely to adversely affect, the subject population of Canada lynx." The Lynx BA team recommended amending or revising Forest Plans to incorporate conservation measures that would reduce or eliminate the identified adverse effects on lynx. The Programmatic Lynx BA's determination means that Forest Plan implementation is a "taking" of lynx, and makes Section 7 formal consultation on the HNF Plan mandatory, before actions such as the proposed project are approved. (129-29) Continued implementation of the Forest Plan constitutes a "taking" of the lynx. Such taking can only be authorized with an incidental take statement, issued as part of a Biological Opinion (B.O.) during of Section 7 consultation. The HNF must incorporate terms and conditions from a programmatic B.O. into a Forest Plan amendment or revision before projects affecting lynx habitat, such as this one, can be authorized.	(129-29) The 1999 Programmatic Lynx BA was produced in anticipation of the Lynx being listed as a threatened species in 2000. It documented the conditions that had made it necessary to list the lynx, and it was followed in 2000 by the Canada Lynx Conservation Assessment and Strategy (CLCAS), which detailed the conservation measures that the National Forests needed to adopt in order to recover the lynx. The Helena NF has been following the CLCAS standards and guidelines since 2000 and their modified version in the Northern Rockies Lynx Management Direction (NRLMD) since 2007. These latter standards and guidelines were amended into the Helena Forest Plan in 2007. By following this guidance, Forest Plan implementation does not represent a "taking" of the lynx. See the discussion in the NRLMD ROD (2007) (p. 1-3, 42)and also the Transmittal Letter for the USFWS's BO on the NRLMD, Mar. 19, 2007 [Project Record].
The Programmatic Lynx BA's "likely to adversely affect" conclusion was based upon the following rationale. Plans within the Northern Rockies: generally direct an aggressive fire suppression strategy within developmental land allocations. …this strategy may be contributing to a risk of adversely affecting the lynx by limiting the availability of foraging habitat within these areas. allow levels of human access via forest roads that may present a risk of incidental trapping or shooting of lynx or access by other competing carnivores. The risk of road-related adverse effects is primarily a winter season issue. (129-30)	(129-30) These factors related to the transportation system [items 2, 4], including snowmobile routes, are accounted for in the Divide Travel Plan and are discussed in the Wildlife Background Report (p. 91-92, 98, 192-197, 198-201). (129-31) The Divide Travel Plan deals only with the management of dirt and gravel roads on the National Forest. It does not affect the management of State, county, or Federal

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are weak in providing guidance for new or existing recreation developments. Therefore, these activities may contribute to a risk of adverse effects to lynx. allow both mechanized and non-mechanized recreation that may contribute to a risk of adverse effects to lynx. The potential effects occur by allowing compacted snow trails and plowed roads which may facilitate the movements of lynx competitors and predators. (129-31) provide weak direction for maintaining habitat connectivity within naturally or artificially fragmented landscapes. Plans within all geographic areas lack direction for coordinating construction of highways and other movement barriers with other responsible agencies. These factors may be contributing to a risk of adverse effects to lynx. (129-31) are weak in providing direction for coordinating management activities with adjacent landowners and other agencies to assure consistent management of lynx habitat across the landscape. This may contribute to a risk of adverse effects to lynx. fail to provide direction for monitoring of lynx, snowshoe hares, and their habitats. While failure to monitor does not directly result in adverse effects, it makes the detection and assessment of adverse effects from other management activities difficult or impossible to attain. forest management has resulted in a reduction of the area in which natural ecological processes were historically allowed to operate, thereby increasing the area potentially affected by known risk factors to lynx. The Plans have continued this trend. The Plans have also continued the process of fragmenting habitat and reducing its quality and quantity. Consequently, plans may risk adversely affecting lynx by potentially contributing to a reduction in the geographic range of the species. The BA team recommends amending or revising the Plans to incorporate conservation measures that would reduce or eliminate the identified adverse effects to lynx. The programmatic conservation measures listed in the Canada Lynx Conservation Assessment and Strategy (LCAS) should be considered in this regard, once finalized. (129-32) (Programmatic Lynx BA, at 4.)	highways. The nature of Forest and private roads in the Divide landscape, their influence on habitat connectivity, and the effects of highways on lynx (and other wildlife species) are discussed in the Wildlife Background Report (p. 31-40, 91, 96, 139-143, 192-197, 198-201). (129-32) As noted previously, the conservation measures of the CLCAS, as modified by the NRLMD, have been incorporated into the Helena Forest Plan [Wildlife Background Report, p. 91].

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The Programmatic Lynx BA notes that the LCAS identifies the following risk factors to lynx in this geographic area: Timber harvest and precommercial thinning that reduce denning or foraging habitat or converts habitat to less desirable tree species Fire exclusion that changes the vegetation mosaic maintained by natural disturbance processes Grazing by domestic livestock that reduces forage for lynx prey Roads and winter recreation trails that facilitate access to historical lynx habitat by competitors (129-33) Legal (in Montana) and incidental trapping and shooting Predation Being hit by vehicles Obstructions to lynx movements such as highways (129-33)and private land development	(129-33) These risk factors are discussed in the Wildlife Background Report (p. 89-92, 98-99, 192-197), and those that are relevant to travel management have been examined as to their eeffects on lynx under different alternatives (p. 194-201, 203-204).
As evidenced by the fact that the Canada lynx is now listed under the Endangered Species Act and has potential critical habitat in the project area, it is clear that the HNF must do more that follow its Forest Plan's weak protections provided for lynx. (129-34) The NEPA analysis does not demonstrate that the project and its analysis are consistent with all Standards contained in the Lynx Conservation and Assessment Strategy (LCAS) for lynx critical habitat. This is a violation of NFMA and the ESA.	(129-34) The Helena NF follows standards and guidelines initially proposed in the CLCAS (2000) and modified in the NRLMD (2007). This guidance has been incorporated into the Forest Plan since 2007 [Wildlife Background Report, p. 91-92].
The NEPA analysis does not adequately address the effects of logging on landscape pattern, which is essential for protection of critical habitat. (129-35) The LCAS require that the FS: Maintain suitable acres and juxtaposition of lynx habitat through time. Design vegetation treatments to approximate historical landscape patterns and disturbance processes.	(129-35) The effects of logging on lynx in general are discussed in the Wildlife Background Report (p. 89-90, 96-98) and more specifically for the Helena NF in the Cumulative Effects section of that report (p. 201-203). The discussion is not as extensive as it would be for a vegetation project since none of the alternatives in the Divide Travel Plan propose any logging or other vegetation alteration.

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If the landscape has been fragmented by past management activities that reduced the quality of lynx habitat, adjust management practices to produce forest composition, structure, and patterns more similar to those that would have occurred under historical disturbance regimes. The LCAS sets mandatory Standards that would modify or amend the Forest Plan—steps the HNF has thus far not accomplished. Important Programmatic Standards include: Identify key linkage areas that may be important in providing landscape connectivity within and between geographic areas, across all ownerships. (LCAS at 89.) Develop and implement a plan to protect key linkage areas on federal lands from activities that would create barriers to movement. Barriers could result from an accumulation of incremental projects, as opposed to any one project. (Id.) (129-36) Map and monitor the location and intensity of snow compacting activities that coincide with lynx habitat, to facilitate future evaluation of effects on lynx as information becomes available. (LCAS at 83.) On federal lands in lynx habitat, allow no net increase in groomed or designated over-the-snow routes and snowmobile play areas by LAU. (129-37) Among the standards set out in the LCAS are provisions to maintain denning habitat as discussed in the programmatic lynx BO: (129-38) Denning Habitat - Within developmental land allocations, existing Plan direction to maintain old growth habitat was judged to be adequate to provide for lynx denning habitat for all geographic areas except the Great Lakes. (BO at 31.) However, the HNF cannot meet lynx denning requirements unless it is meeting Forest Plan old-growth requirements. The Programmatic BA's analysis of the ability	(129-36) The map of the Northern Rockies Lynx Planning Area that accompanies the NRLMD ROD (2007) shows 2 primary linkage areas associated with the Divide landscape: one running north and south centered on the Continental Divide, and a second crossing private land in the upper Prickly Pear valley connecting the Divide with the Elkhorn Landscape to the east. The first of these is in the Divide Travel Plan Area, the second is not. The Wildlife Background Report discusses linkage through the Plan Area in terms of wildlife species in general (p. 30-40, 138-146) and for lynx in particular (p. 92, 96-97, 192-194, 198-201, 201-203). The Divide Travel Plan, the primary thrust of which is the closing of Numerous Forest roads, will not negatively impact habitat linkage for lynx. Nor is it the role of a travel planning project to tackle and solve programmatic issues of vegetation management. (129-37) As noted in the Wildlife Background Report (p. 194-196), all Travel Plan action alternatives would reduce the miles of over-the-snow routes in lynx habitat. (129-38) Denning habitat standards in the CLCAS were not carried over to the NRLMD—and the Helena Forest Plan—because denning habitat was determined to be abundant and not a limiting factor on which management needed to focus [see the discussion in the NRLMD ROD (p. 14-17). The Divide Travel

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of the Forest Plans, as "amended" by the LCAS, to prevent a "taking" of the lynx is based upon the Forests' meeting such management standards. As the HNF has not yet proved it is in compliance with old-growth species' viability standards or adequately dealing with forest wide old-growth declines, the project may not be in compliance with the LCAS. The impacts of both winter and non-winter motorized route densities must be adequately considered. The LCAS states, "the effects of open road densities on lynx are poorly understood" (LCAS at 95). (129-39) It is not clear that the HNF has a complete understanding of the current level of use of the project area for snowmobiles and other motorized recreational users (129-39). Please analyze the cumulative impacts on lynx from the additional new roads, additional skid trails, and other logging access routes to be constructed in the project area—roads/access routes that could be used by snowmobilers snowmobiles and other motorized recreational users, snowshoers, and cross country skiers long after the logging activities have stopped. These roads/access routes can also impact lynx habitat during all seasons because of increased access for humans. From Ruggiero, et al. (1999: "Lynx metapopulation dynamics operate at regional scales" (p. 24). There must be maps and adequate discussion of the connectivity issue in the DN, making it possible to see the landscape features that affect connectivity and metapopulation dynamics within and between LAUs both within and outside the project area, a goal of the LCAS mapping requirement. The very existence of roads and compacted travel routes from motorized vehicles in snow adversely affect lynx because of the advantage provided for other predators that normally wouldn't be in portions of the project area in winter. (129-40) Grizzly Bears Closed and/or barriered roads must be included in the Total Linear Road Mileage	Plan would not affect denning opportunity other than where road closures might make some areas more palatable for lynx denning [see Wildlife Background Report, p. 91, 192-193]. Lynx denning habitat may occur in old-growth, but the vast majority of potential denning habitat on the Helena NF occurs outside old-growth. The key element is accumulated coarse woody debris, which is not tied to old-growth [Wildlife Background Report, p. 89]. (129-39) The density and pattern of open roads, motor trails, and snowmobile routes are displayed (in tables, maps, and photos) and discussed in detail throughout the Wildlife Background Report in relation to a variety of species (p. 31-40, 48-49, 52-58, 86-87, 98-99, 129-130, 139-143, 162-179, 184-190, 194-196, 198-201, 205-206). The effects of roads and snowmobile routes are discussed specifically with regard to lynx (p. 91, 98, 192-196). (129-40) These effects are discussed in the Wildlife Background Report (p. 98, 193-197). All Travel Plan action alternatives would reduce the mileage of over-the-snow routes in lynx habitat and the acreage available for off-route snowmobile riding (Wildlife Background Report, p. 194-196). (129-41) A discussion of the potential impacts of closed roads on grizzly bears and a tally of closed roads in the Divide landscape is provided in the Wildlife Background Report (p. 86-87, 185-187).

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calculation to make sure the Helena N.F. is complying with grizzly bear protection standards (NCDE Access Management Guidelines, (19/19/68) for grizzly bear security and habitat within the recovery zone. (129-41) Wolverine The wolverine was recently determined to be warranted for listing under the ESA. 75 The wolverine, which was chosen by the Forest Service as a management indicator species for the project area, was recently determined to be warranted for listing under the ESA. (129-42) 75 Fed. Reg.78030 (Dec. 14, 2010). It is currently a candidate species, waiting for work to be completed on other species before it is officially listed. The USFWS found that "[s]ources of human disturbance to wolverines include . . . road corridors and extractive industry such as logging …" The Forest Service admits that the wolverine and/or its habitat are present within the project area and would be impacted by the project. The ESA, APA, NFMA and NEPA require that the Forest Service must go through ESA consultation for the wolverine for this project. Attached is the Forest Service's Region 1 guidance to its wildlife biologists regarding wolverine. It directs them not to analyze wolverine in a biological assessment and not to send their analyses to the U.S. Fish & Wildlife Service. (129-43) This is illegal because the ESA regulations require that proposed species be addressed in a biological assessment to reach a jeopardy/no jeopardy conclusion, and then the Forest Service must give the biological assessment to FWS for their concurrence. Following is the legal citation that the Forest Service is violating: Submission of biological assessment. The Federal agency shall submit the completed biological assessment to the Director for review. The	(129-42) The wolverine is no longer a candidate for listing under the ESA. After an 18 month review of the latest scientific information, the USFWS withdrew its initial proposal to list the woverine as a threatened species in August 2014. The wolverine remains a sensitive species in USFS Region 1, but it is not a management indicator species for the Divide Travel Plan Area or elsewhere on the Helena NF (Wildlife Background Report, p. 100). (129-43) The USFS guidance is from March 2013, shortly after the USFWS released its proposal to initiate a review of the wolverine and its suitability for listing under the ESA. In this proposal, the USFWS indicated that climate change was the primary threat to the species: management activities of the USFS and other agencies were not identified as threats—and in all but extraordinary cases such activity would result in "no jeopardy" determinations. USFS guidance was not to forgo analysis of the wolverine, but simply not to include those that reached "no jeopardy" determinations in Biological Assessments. This guidance was developed at the request of the USFWS and applied to the period prior to the listing of the wolverine. After listing, the analyses were to be included in Biological Assessments regardless of the determinations. In the end, the wolverine was not listed—and the 2013 guidance has been moot since August 2014. An analysis as to the status of the wolverine in Divide Travel

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Director will respond in writing within 30 days as to whether or not he concurs with the findings of the biological assessment. . . . Use of the biological assessment. (1) The Federal agency shall use the biological assessment in determining whether formal consultation or a conference is required . . . . If the biological assessment indicates that the action is not likely to jeopardize the continued existence of proposed species . . . and the Director concurs, then a conference is not required. 50 C.F.R.§§402.12 (j),(k)(emphases added). THE AGENCIES MUST PREPARE REGIONAL DIRECTION FOR THE WOLVERINE. The agencies do not have in place any recovery plan and regional management direction amendment for wolverine. (129-44) Ruggierio et al 2000; Wolverines generally scavenge for ungulates along valley bottoms and forage and den in remote, high-elevation areas (Hornocker and Hash 1981; Morgan and Copeland 1998). Thus if mangers wished to provide habitat for wolverines, they could pay particular attention in the planning process to ungulates winter range and other aspects of habitat quality for ungulates to provide a consistent supply of carcasses for wolverine to scavenge. In addition, wolverines generally avoid areas of human activity. To limit the threat of human-caused disturbance or mortality, managers could restrict access to portions of the landscape where wolverines are most likely to occur. Wolverine Ecology and Conservation in the Western United States, by Robert Michael Inman Faculty of Natural Resources and Agricultural Sciences Department of Ecology, Uppsala, 2013 wrote on page 26, “Wolverines selected areas of higher	Plan Area and the potential effects of proposed alternatives was developed as part of the Biological Evaluation and is presented in the Wildlife Background Report (p. 100-104, 204-209, Appendix F). Had the wolverine been listed, a similar analysis of the final Travel Plan decision would have been included in the Biological Assessment sent to the USFWS. (129-44) Agencies do not have a “recovery plan” in place because the wolverine is not a listed species in need of recovery. It is, however, a “sensitive species” in Region 1, and the USFS is thus obligated to assess management activity that may influence population viability. These influences and the potential effects of travel management are discussed in the Wildlife Background Report (p. 100-104, 204-209). Development of Regional management direction is beyond the scope of the Divide Travel Plan. (129-45) These aspects of wolverine behavior and habitat use, and the potential effects of Divide Travel Plan alternatives on them, are discussed in the Wildlife Background Report (p. 100-104, 204-209). The Travel Plan has nothing to do with increasing housing

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elevation, where there was steeper terrain, more snow, fewer roads, less human activity, and which were closer to high elevation talus, tree cover, and areas with April 1 snow cover." (129-45) On page 29, Inman wrote, "While there is no indication that dispersal is currently being limited by human development in a manner that has negative consequences for the wolverine metapopulation, it is reasonable to assume that willingness to disperse through developed areas and/or survival of dispersers moving through developed areas would be impacted by increasing road and housing densities at some point." (129-45) THE AGENCIES MUST COMPLETE A NEW BIOLOGICAL ASSESSMENT, BIOLOGICAL OPINION, INCIDENTAL TAKE STATEMENT, AND LYNX MANAGEMENT DIRECTION AMENDMENT FOR THE FOREST PLAN FOR LYNX. The agencies do not have in place a legally and scientifically adequate biological assessment, biological opinion, and incidental take statement for lynx for the Forest Plan for the Helena National Forest. (129-46) Although the agencies rely on the Forest Plan amendment appending the Northern Rockies Lynx Management Direction to the Gallatin National Forest Plan, those amendments are inadequate. The amendments fail to consider important factors and fail to use the best available science on necessary lynx habitat elements, including but not limited to, failing to include standards that protect key winter habitat. THE AGENCIES MUST REINITIATE CONSULTATION ON THE NORTHERN ROCKIES LYNX MANAGEMENT DIRECTION. The Northern Rockies Lynx Management Direction is inadequate to ensure conservation and recovery of lynx. (129-46) The amendments fail to use the best available science on necessary lynx habitat elements, including but not limited to, failing to include standards that protect key winter habitat.	density, and all alternatives reduce open road density on the National Forest. (129-46) The USFWS issued a Biological Opinion (BO) on the effects of the Northern Rockies Lynx Management Direction (NRLMD) on the U.S. lynx population in March 2007. These effects were documented in a USFS Biological Assessment (BA) in December 2006, which determined that they were "not likely to adversely affect" the lynx. The USFWS BO concurred with that determination [see transmittal letter for USFWS biological Opinion, Mr. 19, 2007: Project Record]. The NRLMD has been incorporated into all Northern Region Forest Plans as an amendment since 2007. The science that underlies these assessments, biological opinions, and management direction is discussed in the Wildlife Background Report (p. 89-98, 192-204). This guidance was based on volumnous scientific research and developed through long-term discussion between scientists and management agencies for the better part of a decade. The details of management guidance continue to be modified as needed, based on more recent scientific evidence. These efforts, however, are beyond the scope of the Divide Travel Plan. (129-47)Of the 22 6th-order HUCs included in the Divide Travel

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CLEAN WATER ACT The DivideTravel Plan decision should wait until a TMDL is competed for all streams in the project area as required by the Clean Water. (129-47) The Clean Water Act requires that federal agencies comply with its provisions. The agency must protect water quality and comply with state water quality standards on National Forest system lands. Marble Mountain Audubon Soc. v. Rice, 914 F.2d 179, 182 (9th Cir. 1990); Oregon Natural Resources Council v. U.S. Forest Service, 834 F.2d 842, 848 (9th Cir. 1987); Northwest Indian Cemetery Protective Ass'n v. Peterson, 794 F.2d 688, 697 (9th Cir. 1987); 33 U.S.C. 1323(a) ("Each department, agency, or instrumentality of the executive [branch] . . . shall be subject to, and comply with, all Federal, State, interstate, and local requirements, administrative authority, and process and sanctions respecting the control and abatement of water pollution"); 16 U.S.C. 1604(g)(3)(E)(iii) (timber may be harvested only where "protection is provided for streams, streambanks shorelines, lakes, wetlands, and other bodies of water from detrimental changes in water temperatures, blockages of water courses, and deposits of sediment"); 36 C.F.R. 219.23(d) ("Forest Planning shall provide for -- Compliance with requirements of the Clean Water Act, the Safe Drinking Water Act, and all substantive and procedural requirements of Federal, State and local governmental bodies") and 36 C.F.R. 219.27(a)(4) ("All management prescriptions shall . . . Protect streams, streambanks, shorelines, lakes, wetlands and other bodies of water"). Section 303(d) of the CWA (33 USC §1313(d)) requires that states list water quality limited segments of bodies of water within its jurisdiction. The listed segments are not meeting state water quality standards or failing to meet designated uses due to identified reasons. The states are required to develop Total Maximum Daily Loads (TMDL) for these waters (33 USC Sec 1313 (d)(1)(c)). TMDLs are designed to address all sources of pollution limiting the water quality of the public waters and should include point and non-point sources of pollution, such as sediment generated	Planning area, only the Iron Horse Creek watershed, located in the Holter TMDL planning area does not have a completed TMDL report. There are no streams in the Iron Horse 6th-HUC that are listed on the Montana 303(d) list of water quality limited streams published in 2014. A Water Quality Restoration Plan has been completed for the Lake Helena planning area and the Little Blackfoot River planning area has a completed Framework Water Quality Improvement Plan. Waiting for a completed TMDL document before implementing the Divide Travel Plan would delay the initiation of future projects that could possibly decommission any closed Forest Service roads or unauthorized routes, a potential benefit to water quality in the planning area.Hydro - analysis

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from logging activities. In the absence of a TMDL federal agencies have a duty to avoid further degradation of WQLS stream segments. The Divide Travel Project violates this duty and thereby violates the CWA. The 2012 NFMA planning rule “requires the use of best available scientific information to inform planning and plan decisions." Please demonstrate you are following this requirement. This final planning rule requires that land management plans provide for ecological sustainability and contribute to social and economic sustainability, using public input and the best available scientific information to inform plan decisions. How are you complying with this? The new planning rule says that Responsible officials will use the best available scientific information to inform the plan components and the monitoring program. Are you doing this? The rule states, “Third, Modified Alternative A requires the responsible official to develop coarse-filter plan components, and fine-filter plan components where necessary, to provide the desired ecological conditions necessary to maintain viable populations of species of conservation concern within the plan area, or to contribute to maintaining a viable population of a species of conservation concern across its range where it is not within the Agency’s authority or is beyond the inherent capability of the plan area to provide the ecological conditions to maintain a viable population of that species within the plan area.”Are you meeting this requirement? The rule says, “Species of conservation concern are those plant and animal species whose long-term persistence within the plan area is of known conservation concern. The rule requires that species of conservation concern must be ‘‘known to occur in the plan area’’ and that the regional forester identify the species of conservation	

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concern for which ‘‘the best available scientific information indicates substantial concern about the species’ capability to persist over the long term in the plan area.’’ The rule states, “The Department has considered the concerns raised by many that the requirement for maintaining viable populations of species of conservation concern on the plan area is an impossible task and that attempting to meet this requirement will come at the cost of all other management of the NFS lands. The Department concludes that Modified Alternative A provides a more holistic, consistent, realistic, and effective approach to maintaining native fish, wildlife, and plant species on national forests and grasslands than provided under the 1982 rule, while meeting restoration goals and the mandate of multiple use. Modified Alternative A recognizes that there are limits to the Agency’s authority and the inherent capability of the land, whereas the 1982 rule required management prescriptions to ‘‘[p]rovide for adequate fish and wildlife habitat to maintain viable populations of [all] existing native vertebrate species,’’ (See 1982 rule at § 219.27 (a)(6)) regardless of whether there are circumstances outside of the authority or the control of the Agency. Examples of circumstances that may be outside of the Agency’s authority or the inherent capability of the plan area are provided above in the rationale for non-selection of Alternative B. The Department concludes the management emphasis on species of conservation concern is more focused than the viability provisions under the 1982 rule, which included all vertebrate species whether there was concern about their persistence in the plan area or not. Since these species may be wide ranging or may occur on multiple units, the regional forester, in coordination with the responsible official, will identify species of conservation concern. Requiring that the regional forester identify species of conservation concern will increase consistency across units and build efficiency into the Agency’s collective efforts to maintain the diversity of plant and animal communities. The Department also considered the challenges the Forest Service has faced in monitoring management indicator species (MIS) under the 1982 rule. MIS monitoring has been the subject of much of the legal debate around the species provisions of the 1982 rule. Modified Alternative A does not include requirements to designate MIS or monitor their population trends. The concept of MIS as a	

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surrogate for the status of other species is not supported by current science, and population trends are difficult and sometimes impossible to determine within the In the final rule, MIS monitoring has been replaced with monitoring of focal species. The concept of focal species is well supported in the scientific literature and community. Focal species are not surrogates for the status of other species. Focal species monitoring provides information regarding the effectiveness of the plan in providing the ecological conditions necessary to maintain the diversity of plant and animal communities and the persistence of native species in the plan area." Modified Alternative A does not require or prohibit monitoring of population trends of focal species. Instead, it allows the use of any existing or emerging approaches for monitoring the status of focal species that are supported by current science. Monitoring methods for evaluating the status of focal species may include measures of abundance, distribution, reproduction, presence/absence, area occupied, survival rates, or others.” "Section 219.3 of the final rule requires the responsible official to document how the best available scientific information was used to inform the assessment, plan decision, and design of the monitoring program. Such documentation must: identify what information was determined to be the best available scientific information, explain the basis for that determination, and explain how the information was applied to the issues considered. This requirement will provide transparency and an explanation to the public as to how the best available scientific information was used to inform how the responsible official arrived at important decisions. Section 219.14 includes additional requirements for the plan decision document to increase transparency and explain the rationale for decisionmaking." "The Department clarified how BASI will be used in the planning process; changing the wording from ‘‘the responsible official shall take into account the best available scientific information,’’ to ‘‘the responsible official shall use the best available scientific information to inform the planning process.’’ This clarification is consistent with the Department’s intent as described in the preamble to the proposed	

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rule. This clarification is in response to public comments expressing concern that the proposed rule wording would allow the responsible official to ignore best available scientific information. This wording makes clear that the responsible official must use the BASI to inform the process and decisions made during the planning process." Are you meeting these requirements? The issue for elk is not population levels, but vulnerability. This is addressed in the Helena Forest Plan by measuring the harvest of bulls the first week of hunting, and by the MFWP by the post-season bull/cow ratio. Yet there is basically no analysis of how the project will affect elk vulnerability. The current situation is unknown. The expected changes in vulnerability are not identified. The Helena Forest Plan grizzly bear standard of 0.55 miles per section in occupied habitat is a poor measurement of road densities, as local areas of high road densities are washed out by roadless areas. A more meaningful analysis could be provided by addressing the current best science for grizzly bears whereby road densities outside security areas are measured separately. Smaller analysis areas would also enable the agency to identify areas where road densities between security areas are excessive, and where they could be reduced through travel planning. The DEIS did not indicate why the moving windows analysis was not also completed for the grizzly bear distribution area. This could show areas that need improvement, as in #2 above. There is no discussion in the DEIS as to what the current level of incidental take of grizzly bears is within the recovery zone as well as the distribution area. What is the criteria for measuring incidental take in these two areas, and is it being met with either action alternative? The DEIS noted that the elk security areas will benefit grizzly bears. However, it was noted that grizzly bears are dependent upon dense cover, and the Forest Plan amendment for elk security areas does not require any hiding cover. This should be addressed in effects. There does not appear to be any access requirements for grizzly bears in the distribution zone. How can incidental take of grizzly bears be addressed without	

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this? Are there any management recommendations in the Biological Opinion for grizzly bears in the Helena Forest Plan for grizzly bears in the distribution zone? It seems unlikely that these don't exist, however they are never mentioned. The low elevation areas required by grizzly bears in the spring are also the areas most likely to be impacted by roads. The DEIS did not address potential problem areas for bear spring use versus motorized routes, except for snowmobile use. It is not clear why the snowmobile use of grizzly bear spring use is allowed when core habitat is deficient in the Red Mountain subunit. There is no discussion as to how mountain bike use could affect grizzly bear security, even though many areas will have new bike trails constructed through them. How do you know this will have no effect of grizzly bear security, and how were these new trails planned in regards to grizzly bears? (129-48) The DEIS notes that lands acquired from Plum Creek and the Nature Conservancy will have increased motorized use. The location of these lands is not mapped. The impact on grizzly bear security is not identified. The actual plans for motorized access in these new lands is never discussed. If public access has not been allowed previously, why is new access planned when it will harm grizzly bears? (129-49) The definition of open and total roads is never provided in the DEIS as per grizzly bears. If a road is simply closed, and not obliterated to prevent any type of human use, then it is still a road. There was no information in the DEIS as to whether decommissioned roads are considered a road or not a road. The Interagency Grizzly Bear Committee (IGBC) criteria for roads identifies a road as a road unless it has been obliterated. The DEIS should be more clear in this regard. It appears that the DEIS has provided false information on the change in total roads, as roads put in cold storage are not being counted as roads, as far as we could tell, when they are still roads as per the IGBC criteria. (129-50) The IGBC criteria for roads also require that gated roads count as open roads due to administrative use. Yet this was not clarified in the DEIS. In order to classified as a restricted road, it has to have some type of barrier so that no use occurs, including administrative use. (129-51) How are roads that are open in the summer yet closed in the fall addressed for	(129-48) This comment is beyond the scope of this planning effort because no new trail construction is proposed. (129-49) This comment is beyond the scope of this planning effort because no lands will be acquired (129-50) This comment appears to be from a different project. (129-51) This comment appears to be from a different project.

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grizzly bears? The open road density in the distribution zone may be very high, since the total landscape, including roadless lands, averages 1.6 miles per section. The management of roads in key areas between security areas was not addressed, which as we noted previously, is important for making security areas functional to bears. The DEIS never provided an analysis of the effect of keeping road on the system (in cold storage) versus obliterating them. This is important to grizzly bears as roads in cold storage will be intermittently opened for use, which this will not occur if roads are obliterated. We are not sure how the DEIS would get at this, but there is clearly a need to address the longer-term management of roads. How did the agency make the decision to keep a road in cold storage versus obliterating the road for long term grizzly bear security? The grizzly bear linkage areas were not mapped. Please map them. The travel management decisions for these particular areas are thus never outlined to the public. It would seem that closure of motorized access routes within linkage areas would have a higher priority that closures in other areas. The effect of opening newly-acquired lands to motorized access, as well as the new construction of mountain bike trails could also impact linkage zones, and should have been addressed. (129-50) The DEIS notes that road management decisions were based on long term management objectives, including timber harvest. Yet the rationale for various closures in regards to future timber management was never addressed. This is an important part of the travel plan, as the agency is basically outlining areas where they want to maintain road access for future timber harvest, including the numerous foreseeable projects outlined in the DEIS. The tradeoffs required in deciding whether to keep or obliterate a road in order to have timber harvest in the future was never addressed in the DEIS. The public has basically no idea of why certain roads will be kept on the system. The travel plan is basically a land use plan, without any underlying information being provided as to why the future land uses were determined to be more important than long-term improvements for wildlife.	

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Thank you for your time. Thank you for considering our comments. Sincerely yours, /s/ Michael Garrity Alliance for the Wild Rockies P.O. Box 505 Helena, Montana 59624 406-459-5936 And for Sara Johnson Native Ecosystems Council P.O. Box 2171 Willow Creek, MT 59760 And for Steve Kelly Montana Ecosystem Defense Council P.O. Box 4641 Bozeman, MT 59772	
(130) From: John Gatchell <jgatchell@wildmontana.org> Sent: Thursday, June 12, 2014 11:44 AM To: FS-comments-northern-helena-helena Subject: "Divide" Travel Plan Draft & DEIS, Helena NF Attachments: MHDT DiVIDE DEIS.pdf Dear forest officials,	

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Please include in the record, the attached electronic scan of signed comments on the Draft (Continental) Divide Travel Plan and DEIS on behalf of Montana High Divide Trails and the Montana Wilderness Association. A signed original hard copy will be hand-delivered to the Helena Ranger District. For the wilds of Montana John Gatchell Conservation Director Montana Wilderness Association Helena, MT 59601 Tel: (406) 443-7350, ext. 106 http://wildmontana.org (NOTE TO IDT: More to come.. The letter in its entirety plus attachments can be viewed at: O:\NFS\Helena\Project\TravelPlan\Divide\Documents\ProjectRecord\g_DEISandComments\DEIScomments - (140612_Gatchell_MTWA).	

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  June 12, 2014 Heather Degeest Helena District Ranger, Helena National Forest 2880 Skyway Lane Helena, Montana 59602 UNIFIED RECOMMENDATIONS: CONTINENTAL DIVIDE DRAFT TRAVEL PLAN AND DEIS Dear Ranger Degeest, This letter represents the unified views of nine Southwest Montana outdoor recreation and conservation organizations who jointly submit these travel plan comments and recommendations. These nine groups include backcountry horsemen, bicycle, outdoor, conservation groups of southwest Montana These nine groups also came together to create Montana High Divide Trails, a shared vision connecting quiet trails and wild public lands along the Continental Divide to people and their communities. MONTANA HIGH DIVIDE TRAILS PARTNERSHIP The Divide Travel Plan, initiated 14 years ago, is a long-awaited decision document	

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vital to the future of the Montana High Divide Trails partnership. To explain why we provide a brief history of this agreement and the many diverse outdoor groups united behind it. The Montana High Divide Trails agreement is a carefully balanced package of collaborative recommendations, including: Completing, Connecting and Managing the Continental Divide National Scenic Trail Management of Proposed Wilderness Quiet Trail and Wildlife Conservation Areas Trails to link our communities and secure future access to quiet mountain trails and natural splendors along Montana's Continental Divide. Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 The diverse groups that created Montana High Divide Trails include: Highlands Cycling Club, Mile-High Back Country Horsemen, Wild Divide Chapter of Montana Wilderness Association, Last Chance Back Country Horsemen, Helena Bicycle Club, Great Divide Cycling Team, Helena Trail Riders, Prickly Pear Land Trust, and Helena Outdoor Club. Representatives of these nine southwest Montana recreation, conservation and outdoor clubs have met regularly during the past seven years to review maps, sponsor joint field trips, review travel and forest plans and carry out cooperative trail projects along the Continental Divide on the Helena National Forest. Since 2007,volunteers from Montana High Divide Trails have helped the Helena Ranger District complete a new 7.5-mile section of the Continental Divide National Scenic Trail within the Electric Peak Roadless Conservation Area between	

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Josephine Trailhead and the junction with the Bison Mountain Trail in the Electric Peak Road.less Conservation Area. Approximately 116 miles of the Continental Divide National Scenic Trail are managed by the Helena National Forest, with most of the unfinished trail sections located on the Helena Ranger District in the area covered by the Divide Travel Plan. The long-delayed Divide Travel Plan is of pivotal importance to Montana High Divide Trails Partnership; directly affecting the future of proposed wilderness, proposed quiet trail and wildlife conservation areas and the Continental Divide National Scenic Trail. THE CONTINENTAL DIVIDE NATIONAL SCENIC TRAIL Of special importance to county residents is the future of the Continental Divide National Scenic Trail and the special values of the Helena National Forest lands traversed by America's longest and most scenic mountain trail. - Lewis and Clark County Board of Commissioners For nearly a thousand miles, the Continental Divide National Scenic Trail twists from Yellowstone north to Canada. It's a rugged and majestic mountain landscape, big enough to alter weather systems and send streams and rivers rushing to Oceans on opposite sides of the Earth. The CDT links national parks, wilderness and national forest wild lands harboring vibrant and rare communities of wildlife along the backbone of the Continent. As our western valleys fill and grow, this great mountain chain will only remain as strong as it's weakest links. Nowhere is this more true tl1an on the Helena Ranger District where national forest lands along the Divide narrow and surrounding private lands and inholdings are increasingly developed.	

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Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 CONTINENTAL DIVIDE TRAVEL PLAN In the 14 years since the Helena National Forest initiated Travel Planning along the Continental Divide years of neglect have damaged resources, scarred the land, sanctioned illegal use1 and diminished wild lands. We recognize that you and Supervisor Avey inherited the consequences of past neglect and wish to offer our assistance and cooperation in moving forward to restore responsible recreation and stewardship along the Divide. With this in mind we offer the following unified recommendations for the Draft Divide Travel Plan. Thank you for your time and consideration. BACKBONE OF THE HELENA NATIONAL FOREST The Continental Divide National Scenic Trail (CDT) is the longest and wildest of America's "triple crown" congressionally -designated mountain trails. The CDT enters the Helena National Forest in the headwater s of the Little Blackfoot and runs north along the Continental Divide into the Scapegoat Wilderness. In recent years, the Helena National Forest, with the enthusiastic support of volunteers from Montana High Divide Trails, Back Country Horsemen, mountain bikers, Prickly Pear Land Trust and the Montana Wilderness Association's CDT-Montana has made welcome progress toward completing and protecting the Continental Divide National Scenic Trail.	

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When completed, the CDT will be the longest trail on the Helena National Forest, offering public access to quiet mountain trails and untrammeled open spaces. Just as highways become corridors that link development, trails can serve as corridors of conservation; linking special places and cherished values with people and communities along the way. The Draft Divide Travel Plan is a long-awaited decision setting the future of nearly 75 miles of the Continental Divide National Scenic Trail and majestic surrounding wild lands: Nevada Mountain proposed Wilderness Greenhorn Mountain Sweeny Creek -Priest Pass-MacDonald Pass proposed Conservation Area MacDonald Pass- Jericho Roadless Conservation Area Electric Peak Roadless Area and Recommended Wilderness FOREST PLAN DIRECTION The Helena National Forest Plan (1986) provides forest wide management direction for the Continental Divide National Scenic Trail which applies to the Divide Travel Plan. Forest _____ 1 DEIS page 292, para. I Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 plan direction requires the Helena National Forest to incorporate and follow "management direction" in the approved 2009 CDNST National Comprehensive Plan.	

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The Divide Travel Plan affects 74 miles (nearly two-thirds) of the CDNST on the Helena National Forest, making pivotal decisions on surrounding area travel management and trail segments. The Draft EIS (Appendix A) mistakenly states that forest plan direction for the Continental Divide Trail is "not applicable" to the Divide Travel Plan. (See Table A-1 Forestwide Standards and Forest Plan Consistency (page 1, Appendix A). Here is the CDNST forest plan standard applicable in the Divide Travel Plan: Once the comprehensive plan is approved, management direction will be incorporated further into this plan. Based on the Comprehensive Plan, a more detailed analysis will be completed showing trail segments, objectives and specific route locations Forest Plan direction is to incorporate and follow management direction in the approved CDNST Comprehensive Plan, with "detailed analysis" including travel management of trail segments and surrounding area "objectives" "Based on the Comprehensive Plan." 2009 CONTINENTAL DIVIDE NATIONAL SCENIC TRAIL COMPREHENSIVE PLAN The (revised) CDNST Comprehensive Plan was signed by Chief Tidwell in October 2009.2 This Plan: "..Sets forth direction to guide the development and management of the CDNST...and replaces the 1985 CDNST Comprehensive Plan." (page 1) The 2009 Comprehensive Plan require that:	

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"CDNST plans" ..." are "prepared in conjunction with travel management ..." Forest Plan direction 3requires that management direction in the 2009 Comprehensive Plan be incorporated in the forest plan and applied in the Divide Travel Plan. The Divide Travel Plan will make decisions affecting both recreation and conservation purposes of the Continental Divide National Scenic Trail on the Helena National Forest. The CDNST and the natural, cultural and historic resources along its corridor are year- round resources intended to provide "high-quality" non-motorized recreation and to conserve natural values within the CDNST corridor in all seasons. _____ 2 http: //www.fs . fed . us/cdt/main/cdnst comprehensive plan final 092809 . pdf 3 National Forest Management .\er of 1976; (16 U.S.C:. 1600) Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 The "nature and purposes" of the CDNST are spelled out in the 2009 Continental Divide National Scenic Trail Comprehensive Plan: The Continental Divide National Scenic Trail was established by an Act of Congress on November 10, 1978 (16 USC 1244(a)). The nature and purposes of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor. (emphasis added)	

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The Continental Divide Trail includes recreation and conservation purposes: "to provide for high-quality" non-motorized recreation "to conserve natural, historic, and cultural resources along the CDNST corridor." Decisions made in the Divide Travel Plan -management of trail segments and surrounding area travel management- directly affect recreation and conservation purpose of the CDNST. The CDNST and the special values of its surrounding corridor are year-round resources . Quiet winter recreation is expressly cited in the Comprehensive Plan as meeting the nature and purposes of the CDNST. 4 Natural, historic and cultural values likewise require conservation in all seasons. As a year-round travel plan, the effects of Divide alternatives on CDT purposes must be evaluated year-round. To fulfill these purposes, the Comprehensive Plan directs forest managers to evaluate the effects of proposed alternatives using the Recreation Opportunity Spectrum (ROS) which measures the effects of area travel decisions on CDT landscapes, as well as trail segments. "Forest Service and Bureau of Land Management managers will classify the CDNST opportunities based on the existing or proposed ROS classes through which the trail passes. Both agencies will use ROS inventory and management processes to develop management prescriptions ..." (2009 CDNST CP, page 15) Recognizing that the 3100-mile CDNST must cross roads and highways where it is not possible to modify settings, the 2009 Comprehensive Plan directs forest managers to evaluate and make decisions that result in non-motorized ROS settings "where possible."	

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_Where possible, the CDNST will be located in primitive and semi-primitive non-motorized settings, which will contribute to providing for maxinmm outdoor recreational potential and conservation of natural, historic and cultural resources in the area traversed by the CDNST. (FSM 2353.44b) _____ 4 "...cross-country skiing, and snowshoeing are compatible wi the the nature and purposes of the CDNST" -2009 CDNST CP, page 15, Recreation Resource Management Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 The Divide Travel Plan EIS lacks a "detailed analysis" showing the effects of area travel management surrounding specific CDNST segments, as required by the Forest Plan, EO 11644 and the 2009 CDNST Comprehensive Plan. A first step in the analysis of area management surrounding the CDNST is to determine where it is "possible" to provide area non-motorized settings. Alternative travel scenarios can then be evaluated to determine which best meets CDNST purposes and direction. Table 1 illustrates this: "Where possible, the CDNST will be located in ...non-motorized settings..." Table 1. CONTINENTAL DIVIDE NATIONAL SCENIC TRAIL Area Travel Management	

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	(130-1) Refer to Alternative 5.

CDT Segment	Non-Motorized Area -possible?	Alt 1	Alt 2	Alt 3	Alt 4	CDT Recreation and Conservation Purposes
Bison-Josephine [5] Electric Peak Roadless	Yes, matching B-DNF Area [6]	----	No	No	No	CDT purposes met with year-round NM Area, matching BDNF.
FR 495 -Jericho	No	No	No	No	No	CDT will be relocated
Jericho Roadless – MacDonald Pass [7]	Yes	---	Yes	Yes	Yes	CDT purposes met in 2,3 4.
Highway 12 area	No	No	No	No	No	Crosses highway
MacD. Pass-Priest Pass (includes MDP cross country ski area)	Yes	No	No	No	Partly	CDT purposes met with year-round NM Area(s), separated by FR 335. (1802b2 (CDT) = NM) [8]
Priest –Mullan Pass	Yes, to Mullan Pass	No	No	No	No	Purposes can be met by including CDT within Sweeny NM Area
Mullan-Greenhorn	No	No	No	No	No	Area is heavily roaded
Greenhorn Mountain	Yes	No	No	No	No	NM Area possible on Greenhorn
Greenhorn-Meyers Hill	No	No	No	No	No	CDT follows system roads.
Nevada Mountain Roadless Area	Yes	---	No	Yes[9]	No	Largest CD roadless area, highest # wildlife species, NE area omitted. Alt 3 partly meets CDT purposes

Montana High Divide Trails requests the Divide Travel Plan be revised, developing a new alternative (3+) for travel that meets recreation and conservation purposes of the 2009 CDNST Comprehensive Plan. (130-1)

5 CDT now follows roads from Josephine Trailhead (north) but will be extended along CD to Forest Road 1863A.
6 Adjoining Beaverhead-Deerlodge NF (roadless) Areas are Non-Motorized Year-Round. Bison Creek also adjoins Electric Peak Rec'd Wilderness.
7 Alternative 2 proposes Mike Rennig Gulch (lyn x habitat) as designated snowmobile route.
8 Alternatives 2,3 and 4 propose to convert CDT (1802b2) from Priest Pass to the Ski Area in to new designated snowmobile route. This is ill-conceived and contrary to CDT purposes.
9 Alt 3 is based on Divide-Lincoln Winter Recreation Agreement (2005) endorsed by Montana Snowmobi le Association, MWA, Ponderosa Snow Warriors and MT Fish Wildlife and Parks.

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Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 Continental Divide National Scenic Trail, applying management direction in the 2009 CDNST Comprehensive Plan, as required by the Helena Forest Plan. The DEIS fails to provide legally-required analysis of the impacts of specific vehicle types (winter and summer) on areas and trails and entirely omits 12-14,000 acres of the Divide landscape from legally-required travel analysis. 10 (130-2) Montana High Divide Trails requests that these flaws be corrected, to ensure all Helena National Forest lands along the Continental Divide are fully weighed and analyzed. (130-3) CONTINENTAL DIVIDE - NORTH TO SOUTH AREA TRAVEL AND ROUTES Nevada Mountain Proposed Wilderness 50,300 acres. (Lincoln and Helena Ranger Districts) The 50,300-acre Nevada Mountain Proposed Wilderness is the largest and highest roadless area across a hundred miles of the Continental Divide; from Rogers Pass to the Beaverhead- Deerlodge National Forest. Bracketed -north and south- by national forest lands bearing multiple roads, tracks, cutting units and patented mining claims, Nevada Mountain is a sparkling wild gem, keystone to conservation of solitude and historic natural values across the Continental Divide on the Helena Forest. Nevada Mountain Proposed Wilderness provides excellent secure habitat for elk, wolverine, lynx, fisher, pine marten and grizzlies, sustaining a greater diversity of wildlife species than any place on the Helena Ranger District. The roadless area includes a major east-west elk migration corridor, with elk moving across when snows come to winter in large numbers on the east slope of the Divide.	

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Researcher Steve Gehman describes Nevada Mountain Roadless Area as a "hotspot" for wolverines, including females with kits. Nevada Mountain has more evidence of grizzly use than any place on the Helena Ranger District. Nevada Mountain is an exceptional wilderness candidate, endorsed by the Lewis and Clark County Board of Commissioners, members of the Montana Congressional Delegation, and area hunters and anglers since 1979. Nevada Mountain is one of three wild areas on the Helena National Forest endorsed for wilderness by all nine outdoor groups of Montana High Divide Trails.	
I0 11644- "Use of Off-RoadVchicles On Public lands"- reguires that the use of off-road vehicles (including snow vehicles) "be controlled and directed ..."The Forest must analze and determine which "specific areas" of the Helena Ranger District are suited for cross-country driving by snow vehicles and which areas are best for non-motorized managem ent... Areas must "be located ...to minimize harassment of wildlife or significant disruption of wildlife habitats." Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 The Nevada Mountain Roadless Area includes the largest Forest Plan "R-1" Primitive Management Area (non-motorized) on the Forest.	
Management of Nevada Mountain proposed Wilderness is split diagonally between the Lincoln and Helena Ranger Districts. The DEIS fails to consider area travel on LRD. The Divide DEIS fails to consider and protect the outstanding wild land and habitat	(130-2) Refer to Alternative 5.

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values of the Nevada Mountain proposed Wilderness and adjoining winter ranges. (130-4) The DEIS arbitrarily omits 12-14,000 acres from travel analysis including inventoried roadless lands on the Divide, wolverine, grizzly, lynx habitats and winter ranges affected by area travel. (130-5) The DEIS fails to evaluate the effects of designating Nevada Mountain wild lands as open areas suitable for cross-country snowmobile and snow bike traffic, naively assuming it will remain a "safe haven" for wolverine and other wildlife as "undesignated blocks of non-motorized habitat ..." (page 303) (130-6) The DEIS fails to evaluate the combined and cumulative effects of opening non-motorized 4044-El to snow vehicles, changing snow vehicle technologies and designation of Nevada Mountain as an open area for cross country snow vehicle traffic. (alternatives 2 and 4) (130-2) The DEIS fails to consider how various alternatives and related factors affect adjacent non-motorized areas on the Lincoln Ranger District. The DEIS fails to carry forward the 2005 winter recreation agreement, violating the Helena Supervisor's pledge to consider the winter agreement in relevant travel plans. WINTER TRAVEL AGREEMENT - BLACKFOOT AND NORTH DIVIDE In 2005, following 14months of collaborative meetings, the Montana Snowmobile Association, Montana Wilderness Association, Ponderosa Snow Warriors and Montana Fish Wildlife and Parks11 publically announced support for the Lincoln-Continental Divide Winter Recreation Agreement conveying a unified set of recommendations for winter travel zones along the Divide including lands on the Lincoln and Helena Ranger Districts. On Sept 8, 2006, the Lincoln and Helena Ranger Districts initiated scoping and analysis of winter travel for the Blackfoot and North Continental Divide landscape areas covered in the Winter Recreation Agreement:	

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NEWS RELEASE United States Department of ,-\griculture Forest Service Helena National Forest 2880 Skyway Drive Helena, Montana 59601 _____ 11 Fred Bailey represented the Helena Snow Drifters in collaboration of winter use agreement affecting the Helena Ranger District. (Winter Recreation Meeting, notes, Jan 10,2005) Fred did not object or sign the final agreement. Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 FOREST SERVICE OPEN HOUSES TO DISCUSS WINTER TRAVEL PLANNING HELENA, MONT., September 8, 2006- Officials with the Helena National Forest will be hosting two open house meetings to kick-off planning efforts for motorized and non-motorized winter recreation . Specifically the planning effort will only analyze winter travel in the Blackfoot and North Divide landscape areas. The first meeting will be held at the Lincoln Community Center from 4-7 p.m. on Thursday September 14th. The Helena meeting will be held the following week on September 26th from 4-6 p.m. at the Lewis and Clark County Library conference room. The Lincoln and Helena Ranger Districts are preparing a Blackfoot and North Divide Winter Travel Plan Environmental Assessment. The purpose of this planning effort is to implement a plan that has support from both the motorized and non-	

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motorized users which can be successfully implemented, easily understood by recreationists, and more enforceable with delineations between motorized and non-motorized use. The establishment of non-motorized use will benefit various natural resources including wildlife habitat, wildlife populations as well as ensure quality winter quiet areas and protection of pristine areas. Implementation of motorized areas will benefit users with lands that provide a high quality experience of both a trail system and "play" areas. A great deal of discussion has occurred between the Forest Service and user groups. In May 200S, the Montana Snowmobile Association, Ponderosa Snow Warriors, Helena Snow Drifters, Montana Fish, Wildlife & Parks and the Montana Wilderness Association developed a Winter Use Agreement where the groups agreed to areas in the project area where motorized and non-motorized use would be allowed for winter travel in the Blackfoot, Continental Divide landscapes. The Helena National Forest committed to considering the Winter Use Agreement ... Before the Winter Travel Plan was signed by Supervisor Avey (Sept. 2013), Helena Ranger District lands were dropped from the winter plan; with the promise to analyze these lands and the winter agreement in the Divide Travel Plan. The Draft DEIS, however does not include any alternative that reflects HRD lands from the OS Winter Recreation Agreement . There is no map, analysis or explanation of the North Divide Winter Agreement Area on the Helena Ranger District. 12 Chapter 3 of DEIS entitled "Consistency with Adjacent National Forest Travel Planning" (page SS) contains no map or description of travel management on adjoining Lincoln Ranger District. 12 http://al23.g.akamai.net/7/I23/11558/abc123/forestservic_download.akamai.com/II5	

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58/www/nepa/24780_FSPLT2_029641.pdf Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 District Lands, a winter non-motorized area. (See attached map from Upper Blackfoot Winter Travel Record of Decision signed by Supervisor Avey Sept 2013) Oddly, 12-14,000 acres on the Continental Divide are missing entirely from DEIS analysis, despite the presence of lynx, fisher, grizzlies and wolverine, mule deer and elk winter ranges. Omitted lands include most of the roadless cirques on the Continental Divide suited for natal wolverine denning, adjoining R-1 year-round Non-Motorized Management Area. These oversights merit correction. Montana High Divide Trails continues to support application of the 2005 Winter Recreation Agreement for the North Divide Area of the Helena Ranger District. The Blackfoot-North Divide Winter Agreement protects core habitat and wilderness values of Nevada Mountain, while supporting snowmobile use outside of wild lands and winter habitats on Qegal) established snowmobile system and area. Alternative #3, is the only alternative that reflects part of the 2005 collaborative winter recreation agreement. Alternatives 2 and 4 gut the 05 winter agreement by designating the entire Nevada Mountain Roadless Area as a snow vehicle play area (winter and spring) and opening non-motorized trail 4044-El to snow vehicles funneling snowmobiles and tracked ORVs into the highest and wildest section of the Continental Divide on the Helena Ranger District.	

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Trail 4401-El has been closed to snowmobile use for decades to protect wildlife. 13 The DEIS fails to disclose how opening closed trail 4401-El and the Nevada Mountain Roadless Area to snow vehicles will affect wildlife, proposed wilderness, adjacent Non- motorized lands and the historic natural character of the Continental Divide. The Nevada Mountain Roadless Area and adjoining winter ranges include the highest diversity of wildlife species anywhere on the Helena Ranger District including lynx, wolverine, fisher, moose, denning grizzlies 14 and elk herds which may be adversely affected by the failure to limit over snow motor vehicle travel. Nevada Mountain provides ideal lynx habitat including "boreal forest landscapes supporting a mosaic of differing successional forest stages," and "winter snow conditions that are generally deep and fluffy for extended periods of time..." Lynx are sensitive to expansion of over snow vehicle tracks and use areas. 13 DEIS page 292 para.I .discloses that 77 miles of roads "closed to motorized use year-round, have been regularly used by snowmobilers" and that this illegal vehicle use "has not been challenged by the HNF." The DEIS proposes to reward law-breaking by opening 77 miles of currently non-motorized trails and roads for snowmobile and tracked ORV driving including the Continental Divide Trail and Trail 4401-El in the Nevada Mountain proposed Wilderness. Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 A decision to allocate wilderness candidate lands to motorized travel is the greatest	

Comments	Response to Comments
single factor affecting recommended wilderness in forest plan revision. On the Beaverhead-Deerlodge National Forest, for example, three previously recommended wilderness areas on the Continental Divide were dropped from recommended wilderness in forest plan revision solely because the forest had allowed snowmobile traffic. 16	(130-3) Thank you for your comment.
The Helena National Forest is poised to begin the forest plan revision process in 2015. The forest planning process will evaluate suitable areas for wilderness potential and recommend areas for wilderness. An initial step in forest planning involves the inventory and evaluation of areas suitable for wilderness recommendation. 17 (Land Management Planning Handbook. Wilderness Evaluation. FSH 1909.12.)	(130-4) Refer to Alternative 5.
The Divide Travel Plan will have a greater effect on whether Nevada Mountain remains a viable candidate for Wilderness than any other Decision.	(130-5) Thank you for your comment, refer to Alternative 5.
Alternatives 1, 2 and 4 diminish viability, apparent naturalness, size and manageability, primitive character, solitude and other wilderness qualities of the Nevada Mountain Proposed Wilderness. The loss of wilderness qualities and reduced ranking resulting directly from any of these alternatives will sink Nevada Mountain as a proposed Wilderness. Montana High Divide Trails requests Alternative 3 + for Nevada Mountain, including the omitted Helena Ranger District acres on the east slope of the Divide. We request Alternative 3+ be based on the 05 Winter Recreation Agreement for the Blackfoot and Continental Divide. (Exhibit A-Blackfoot Continental Divide Winter Recreation Agreement) (130-3) We strongly oppose opening non-motorized trail #4401-El and 136D-1 (Continental Divide Trail) to motor vehicle use. (alt.# 2 and 4). (130-4)	

Comments	Response to Comments
Alternative 3 + will be the only alternative to: Adopt winter travel areas just as agreed in the 2005 Winter Recreation Agreement endorsed by snowmobilers, conservationists and Montana FWP. Fully protects secure winter habitat for lynx, wolverine, fisher and grizzlies in Nevada Mountain Proposed Wilderness. Protects mountain solitude and wilderness characteristics for wilderness consideration in upcoming forest plan revision. Provides "high-quality" non-motorized recreation year-round, consistent with the traditional "primitive, challenging" character of the Continental Divide National Scenic Trail in the Nevada Mountain Roadless Area. (130-5)	
_____ 16 Mount Jefferson, West Big Hole and Sullivan-Twelve-Ten Mile Creeks - Anaconda-Pintler Wilderness Additions. 17 The responsible official shall..: (v) identify and <:valumc lands that may be suitable for inclusion in the<: wilderness national preservation yst<:m and determine whl'thcr to rt'commrnd any nch lands for wildt·rncss designation . 36 Cl 'R 219.7(c)(2).	(130-6) Refer to Alternative 5.
Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 Provides "high-quality" non-motorized recreation year-round, consistent with the traditional "primitive, challenging" character of the Continental Divide National Scenic Trail in the Nevada Mountain Roadless Area. 18 Conserve the natural, historic and cultural values of the CDT corridor through the Nevada Mountain Roadless Area. Meyers Hill- Greenhorn	(130-7) Thank you for your input. The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities.

Comments	Response to Comments
Montana High Divide Trails supports adoption Alternative #3 based on the 2005 winter travel agreement which would designates the area south of Meyers Hillas an open area for snow vehicles. 19 In the future we hope to see the CDT relocated off roads and vehicles ways in this area. (130-6) Greenhorn Mountain Greenhorn Mountain is a small roadless area on the Continental Divide, surrounded by roads. The area contains valuable wildlife habitat and can provide important connectivity to larger roadless areas along the Divide. We request Greenhorn Mountain be considered as a non-motorized area to protect the eventual CDT corridor and its special values. We oppose opening closed roads to winter vehicle traffic (alternatives 2,3,4) until area travel of this mountain on the Continental Divide has been fully evaluated. (130-7) Sweeny Creek-Priest Pass-MacDonald Pass Ski Area Montana High Divide Trails wishes to express our support and appreciation for Alternative #4 in the Sweeny Creek Area (Blue Cloud). Both Alternative #4 and #3 rehabilitates extensive motor vehicle damage to natural resources, enhances wildlife habitat needs and protects this as a year-round, non-motorized area. As you know, this small area has experienced significant degradation over the years. Motorized tracks have grown and expanded without authorization or public involvement (therefore, illegally); it has developed into a backyard "kegger" site with resulting trash and litter prevalent; trees and vegetation cut, damaged or destroyed. While a variety of interests have created these problems there is one common denominator behind these illegal, resource-damaging activities -they are all stem from abuse by motor vehicles. We highly recommend not rewarding illegal vehicle use and activities. 18 Montana FWP Resident Trail Useer Surveys (MT State Trails Plan, 2001-MT FWP) indicate 3 of 4 skiers feel snowmobile use is incompatible with their recreati	(130-8) Refer to Alternative 5.

Comments	Response to Comments
on experience. Allowing snow vehicles on CDT is contrary to high quality winter recreation and conservation purposes of the CONST.	
19 Alternatives 3, 2 and 4 open over a dozen closed roads between Meyers Hill and Greenhorn to snowmobile and tracked motorcycles traffic in winter and spring, converting this entire area for the first time into an open snow vehicle driving area, unrestrained by long-closed roads. Except for 4401-El and 1360-1-(Continental Divide Trail) which must remain non-moto1ized, we are willing to accept these changes here in return for non-motorized year round area travel in Nevada Mountain to the north, as shown in WRA Map,(proposed) Alternative 3+. (13-8)	(130-9) Refer to Alternative 5. (130-10) Refer to Alternative 5.
Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014	
It should also be noted that in a recent newspaper article, an ATV user group has acknowledged that concentrated motorized use in a small area causes resource issues. That is one reason they are advocating for long, loop-type routes to available for their use. We understand the need for an appropriate trail system for ATV use and are making recommendations to accommodate long, loop trails (see our comments on the Electric Peak and Kading Ridge areas). The current situation in the Sweeny Area is the accumulation of neglect and turning a blind eye to damage and motor vehicle abuse.	(130-11) Refer to Alternative 5.
We request expansion of Sweeny Creek Non-Motorized Area to include the Continental Divide National Scenic Trail between Mullan Pass and Priest Pass. Sweeny and extension of the MacDonald Ski Non-Motorized Area to Priest Pass to provide high quality year-round recreation and conserve the outstanding natural and historic values of the Continental Divide National Scenic Trail Corridor in this area. (130-9)	(130-12) The preferred alternative does allow for protection from motorized use adjacent to the Electric Peak IRA.
Sweeney Creek Road should be designated as the year-round legal motor vehicle	

Comments	Response to Comments
route through an otherwise expanded non-motorized area. (130-10) MacDonald Pass South to Jericho Mountain Conservation Area Montana High Divide Trails supports Alternative #4 which protects the Continental Divide and its corridor through much of the Jericho Mountain Roadless Area as year-round non-motorized. We note there are also numerous old road segments in portions of this area that may no longer serve any useful purpose. Most are less than a mile in length, many less than 1/2 mile, and are dead ends. We suspect many of them were associated with old mining activities. If there are no longer current legitimate needs for their use, we recommend closing them to motorized use year-round. (130-11) Electric Peak Recommended Wilderness and Conservation Area The DEIS fails to analyze the effects of proposed motorized area travel in the Electric Peak Roadless Area, (130-12)overlooking Montana High Divide Trail's express request in 2009 comments that Electric Peak Roadless Lands along the Continental Divide between Bison Mountain and the headwaters of Ontario Creek be managed as a year-round non-motorized area. 20 _____ 20 Page 6-7,Jan. 15, 2009 MHDT letter to District Ranger Duane Harp: Bison-Continental Divide Non-Motorized Area Adjoining the Recommended Wilderness on Bison Mountain is an important predominantfy roadless corridor reaching 8 miles east along the Continental Divide, encompassing the headwaters of Bison and Ontario Creeks.20 This area not only offers non-motorized recreation but is also a very important wildlife corridor including numerous springs and seeps,patch meadows, moist forest and ideal habitat for lynx, wolverille, elk, moose, marten and bears. ...Of particular importance to Montana High Divide Trails is the fact that this area includes ...Continental Divide National Scenic Trail 20 ..The proposed action allocates this	(130-13) Refer to Alternative 5. (130-14) Refer to Alternative 5.

Comments	Response to Comments
sensitive area to motorized and reverses permanent year-round vehicle c/omres to expand motorized traffic. We oppose this change and instead request the Divide Travel Plan (130-13) Retain unchanged existing non-motorized managemmt of old logging roads in Monarch and Ontario Creek –as promised when built. 20; These headwater streams serve as nurseries of native trout. (130-14) Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 As in Nevada Mountain, the DEIS again fails to consider consistency of adjoining roadless lands on the Beaverhead-Deerlodge National Forest, despite the fact the BDNF provided a travel map printed on page 57 showing the adjoining year-round non-motorized management area (circle 1). 21 Electric Peak roadless lands here follow the Continental Divide encompassing the newest section of the Continental Divide National Scenic Trail on the Helena Ranger District, a non-motorized trail. The 2009 CDNST National Comprehensive Plan directs trail managers "where possible " to manage areas surrounding the CDT as (primitive or semi-primitive) non-motorized areas. Snowshoeing and skiing are primary recreational uses of the CDNST, as stated to the 2009 National Plan. Skiing and snowshoeing in quiet backcountry settings is considered highly desirable. This is just such a setting. Bison Creek and other roadless lands along the Continental Divide provide excellent secure habitat and travel corridors for lynx, wolverine, moose, pine marten and grizzlies known to live in the Electric Peak Roadless Area.	(130-15) Refer to Alternative 5.

Comments	Response to Comments
The proposed actions (2,3,4) would adversely affect the Continental Divide Trail and the historic and natural values of its roadless corridor. Bison Creek also shares the open slopes and excellent habitat of Bison Mountain in the Electric Peak Recommended Wilderness Powerful new snowmobiles and tracked motorcycles can readily climb open and forested slopes from Bison Creek into the Electric Peak Recommended Wilderness and adjoining Beaverhead-Deerlodge Forest Plan Non-Motorized Management Areas along the Divide. A chunk of the proposed over snow driving zone along the Continental Divide is also within Forest Plan Management Area W-1 where wildlife values are primary and "restrictions on vehicles may be necessary to protect wildlife values." The Electric Peak roadless lands in question provide excellent habitat conditions for lynx, wolverine, grizzlies, moose and pine marten.	
Protect the Continental Divide Trail – and the significant nautral, historic, cultural, and scenic features of its roadless corridor from Bison Mountain – Monarch Creek to Josphine Mine as a dedicated non-motorized “Quiet Trails” area – ope to quiet biking, mountain bicycles, hunters and equestrian travel. 29 (130-15) 21 DEIS Page 55 -"Consistency with Adjacent National Forest Management" overlooks two of three roadless areas on the Continental Divide where the Helena Ranger District meets other national forest jurisdictions. Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014	(130-16) Refer to Alternative 5. (130-17) Thank you for your comment.

Comments	Response to Comments
The DEIS fails to consider the combined consequences of surrounding the Electric Peak Recommended Wilderness with over snow-driving areas in Bison Creek and opening non- motorized ski tracks (old logging roads) in Monarch Creek.	(130-18) Thank you for your input.
Contrary to assumptions in the DEIS, this area has never been designated as an open winter driving area. 22 The forest closed roads following timber sales with the intention to limit vehicle traffic including over snow vehicles. Forest Road 4104A is a designated snowmobile trail which approaches but does not traverse the Electric Peak Roadless Area. Alternative 3 best protects this 47,000-acre wild land in the headwaters of the Little Blackfoot with the following changes: (Alternative 3 +) Consistent with adjoining forest lands, manages all Electric Peak roadless lands along the Continental Divide between Bison Mountain and the headwaters of Ontario Creek within a year-round non-motorized area. (130-16) Support Alt #1 (no change) to keep closed logging roads in Monarch Creek non-motorized year-round. This includes closing FR #4104 to motorized use at the existing gate near its junction with FR#4104A1. (130-17)	(130-19) Thank you for your comment.
If those changes are made, and if the district commits to measures to prevent motorized use-winter and summer-from leaving this route, we would then accept (now-closed) FR 4104A 1in Ontario Creek be converted and used as both a legal ATV and snowmobile route to connect the Ontario Creek Road across to the Tenmile Creek Road. (130-18) This new combination (Alt 3+) will provide a long loop route for ATV users and opportunities for snowmobiling, while protecting historic natural values, wildlife habitat and connectivity for wild lands along the Continental Divide. (130-19)	(130-20) Refer to Alternative 5.

Comments	Response to Comments
	(130-21) Refer to Alternative 5.
Kading Ridge Alternative 3 best represents our desires for the Kading Ridge Area, with a couple of modifications. In an effort to accommodate some loop trail opportunities for ATV users, we recommend the following three routes to be open to motor vehicles 50" or less from 5/16-8/31 (only):	(130-22) Refer to Alternative 5.
_____ 22 The FS is required by law (E 0 11644 Sec 3 "Zones of Use") to analyze and determine which forest areas are suitable for motorized travel (including snow vehicles) and which areas are best suited for non-motorized travel. In the 1970s and 80s, the forest commonly relied on road and trail restrictions to manage snowmobiles, an approach no longer considered pragmatic due to changing snowmobile technology. Divide is the only forest area yet to complete an area travel plan since the advent of powerful snowmobiles and (new) snow-tracked motorcycles that can readily drive into previously remote landscapes. The DEIS mistakenly assumes areas never analyzed should be treated as open snow vehicle travel zones exactly the same as analyzed winter OSV use areas in winter travel plans for the North and South Big Belts, Elkhorns and Lincoln Ranger District.	
Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 MTR 501 from the Little Blackfoot River Road to the junction with Route 1870 FR 314 at the top of the Kading Ridge FR 314 from the junction with MTR 501 west to the gate near Spotted Dog Creek Route 1870 from the junction with MTR 501 north along the ridge to the road closure near Irish Mine Hill.	
These routes will provide a long, loop opportunity for ATV use while minimizing their negative impacts by reserving the rest of the area for non-motorized use. MHDT also supports snowmobile use in this area, outside of the Electric Peak Rec'd	

Comments	Response to Comments
Wilderness . (130-20) SUMMARY RECOMMENDATIONS Montana High Divide Trails respectfully requests a new alternative (3A) be devised for the Final Divide Travel Plan that corrects major oversights and fully recognizes and conserves the outstanding long-term values of the Continental Divide on the Helena Ranger District including the Nevada and Bison Mountain Roadless Areas, and the CDT Corridor Between MacDonald Pass and Greenhorn Mountain. (130-21) While we support and commend specific elements of alternatives 3, 4 and 1 (no action), we cannot endorse any as a result of significant flaws and the failure of the DEIS to evaluate and conserve the full range of values of the Continental Divide and Continental Divide Trail; so greatly affected by the Divide Travel Plan. (130-22) Montana High Divide Trails - PLEDGE OF COOPERATION Our common goal is to participate fully in the public process with the goal of significant improvements for managing the Continental Divide in the final Divide Travel Plan. The nine member groups of Montana High Divide Trails offer our continuing pledge to work cooperatively to: Assist Helena Ranger District District to secure new funds and partnerships that help achieve goals of Montana High Divide Trails. Enlist volunteers from conservation, hiking, equestrian, bicycling and other communities to cooperate with national forest managers to maintain, restore and construct quiet mountain trails for public use and enjoyment.	

Comments	Response to Comments
Support revised forest and travel plans consistent with the goals of Montana High Divide Trails. Support specific trail and stewardship projects that help achieve goals of Montana High Divide Trails. Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft Ms. Heather Degeest, Helena District Ranger June 12, 2014 Support legislation that helps achieve the goals of Montana High Divide Trails. Cooperate with public land and wildlife managers to conserve, restore and enhance excellent habitats for fish and wildlife species along the Helena National Forest reach of the Continental Divide. Expand public understanding and support for the goals and cooperative approach of Montana High Divide Trails. Montana High Divide Trails support protection of untrammeled wild lands and open space which help sustain an uninterrupted corridor for wildlife while meeting multi-agency goals to manage the Continental Divide National Scenic Trail for "high quality" non-motorized recreation and to conserve natural, scenic and historic features along the corridor traversed by the Continental Divide Trail. Hikers, horseback riders, mountain bikers, walkers, skiers, snowshoers, trail-runners and non-motorized users agree "high-quality" outdoor recreation relies on quiet (non-motorized) mountain trails. 22 Our goal as the groups behind Montana High Divide Trails is to work together to preserve the traditions, freedom and untrammeled solitude of the old west for the benefit and enjoyment of people of the new west. We feel one of the most effective	

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ways of reaching this goal is through the support of quiet mountain trails and conservation of wild land areas and wilderness. Looking to the future our hope is to work together with the Helena Ranger District to adopt a final Divide travel plan that will result in a wide-ranging, diverse system of quiet mountain trails, wild habitat and wilderness along the Continental Divide through the Helena National Forest. The diverse groups behind Montana High Divide Trails, including bicyclists, backcountry horsemen/women, hikers, outdoor, land trust and conservation organizations offer our labor, time and resources to assist the Helena Ranger District to restore, complete and maintain an outstanding system of quiet trails and wild open spaces for the enjoyment of families, communities and people of all ages. Thank you for considering our unified recommendations on the Draft Divide Travel Plan and DEIS. We look forward to working with you and staff on the Helena Ranger District along Montana's Majestic Divide. _____ 23 2001 Montana State Trails Plan, see FWP trail user surveys	

Comments	Response to Comments
Montana High Divide Trails, Unified Recommendations. Divide Travel Plan Draft 19 Ms Heather Degeest, Helena District Ranger June 12, 2014 Sincerely, Dennis Milburn Montana High Divide Trails Last Chance Back Country Horsemen 5723 Austin Rd Helena, Montana 59602 Eric Grove Montana High Divide Trails Great Divide Cycling Team 724 S Beattie Helena, Montana 59601 W J Hallinan Montana Wilderness Association Wild Divide Chapter 438 Clark Street Helena, Montana 59601 Attachments. cc: Tom Tidwell, Chief, US Forest Service Faye Krueger, Regional Forester, US Forest Service, Northern Region (R1) William Avey, Supervisor, Helena and Lewis and Clark National Forests George Bain, R-1 Director of Recreation, Lands, Heritage Montana Fish Wildlife and Parks (Editorial Note: This Comment Letter is too large for this document. The letter and attachements in their entirety are stored in the project record located at the Helena Ranger District.)	
(131) From: Jerry Grebenc <jerrygrebenc@gmail.com>	

Comments	Response to Comments
Sent: Thursday, June 12, 2014 3:26 PM To: FS-comments-northern-helena Subject: Divide Travel Plan I am writing as an individual who regularly hunts and hikes both the Nevada Mountain and Bison Mountain roadless areas. First off, I urge the Helena National Forest to protect the non-motorized characteristics of the Nevada Mountain area by adopting Alternative 3. As you no doubt have heard from any others, this is the only alternative that is based upon the 2005 collaborative winter travel management agreement endorsed by the Montana Snowmobile Association, Montana Fish Wildlife and Parks and the Montana Wilderness Association. Second I urge you to enhance the character of the Continental Divide Trail (CDT) corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round protection to all of the Little Blackfoot Roadless area, i.e. headwaters of the Little Blackfoot River. To complement a non-motorized section of the CDT in the area of the Little Blackfoot, I would also ask that you also expand year-round non-motorized protection to the CDT from MacDonald to Priest Pass; Priest to Mullan Pass. (131-1) Sincerely, Jerry Grebenc 524 North Davis Helena, MT 59601 406-443-9199	(131-1) Refer To Alternative 5.
(132) Transcribed from hand written letter Received 06/12/2014 Hank & Karen Hudson 32 Hill Brothers Road	

Comments	Response to Comments
Clancy, MT 59634 I am writing to provide my input for the Divide Travel Plan. Thank you for this opportunity.	
There are several aspects of this plan that are very disappointing. My recommendation is to begin with alternative #3 and then work to improve it. Specifically, consider making all of the Continental Divide Trail, not already on an approved vehicle road, non-motorized. I have recently hiked this entire segment with visiting friends. We saw much vehicle damage and were looking forward to the USFS following Congressional direction and making the CD trail quiet and non-motorized. It appears under your plan not even one-third of the trail in your District will be non-motorized. You can do better. (132-1)	(132-1) Refer To Alternative 5.
-Please keep all of Nevada Mountain roadless all year long. Nevada Mountain is one of the few large roadless areas left in the Helena area. Keep the CD trail and the trails in that area which access the CD trail non-motorized. (132-2)	(132-2) Refer to Alternative 5.
-For many years many of us in Helena have fought to protect all the roadless land in the Electric Peak – Little Blackfoot area. Frequently we witness vehicle damage in this area. Recently I have discovered major damage done by motorized vehicles in your area. Examples are Bill Creek Trail, Crystal Creek in the Elkhorns, Sweeney Creek, the list goes on. The USFS response is always, “We don’t have adequate law enforcement.” No doubt this is true. But, why would you increase motorized use if you know it will lead to more damage. Better to close roads if you can’t protect the Forest. Thanks for the opportunity to weigh in. The general sentiment among those who have reviewed your plan is that you have failed to protect our Forest.	

Comments	Response to Comments
Sincerely, Hank & Karen Hudson 32 Hill Brothers Road Clancy, MT 59634 CC: Sen Tester, Sen Walsh, Rep. Daines	
(133) From: Ralph Knapp <rwknapp@bresnan.net> Sent: Thursday, June 12, 2014 10:07 AM To: FS-comments-northern-helena Subject: Divide Travel Plan District Ranger DeGeest; It seems clear that the Draft Divide Plan creates a bottle neck in the migratory wildlife corridor of the continental divide by (1) failing to adapt Alternative #3 which would protect Nevada Mountain wildlands according to a collaborative agreement of 2005, (2) not extending year-round non-motorized protect to all Little Blackfoot roadless lands to protect the CDT corridor between Bison Mountain and the headwaters of Ontario Creek, and (3)not expanding year-round non-motorized protection to the CDT from MacDonald-Priest pass to Mullan Pass. (133-1) Thank you for rehabilitating vehicle damage in Sweeney Creek and proposing it as a non-motorized area. Please extend this quiet area to the CDT for the good of the wildlife that depend on it. Ralph W. Knapp 3018 3rd Ave S Great Falls 866-0756	(133-1) Refer To Alternative 5.
(134)	

Comments	Response to Comments
From: Ed Koon <elk@koonskabin.com> Sent: Thursday, June 12, 2014 7:52 PM To: FS-comments-northern-helena-helena Subject: Continetnal divide travel plan To: Helena District Ranger, Helena National Forest Re: Continental divide Travel Plan I would like to express my extreme disappointment and anger at the fact that none of the travel plan "Alternatives" include increased, or even normal, access for wheeled motorized vehicles. (134-1)For us elderly citizens, and some handicapped younger people I know, the Forest Service, in collusion with our US Government, is effectively locking us out of our public lands, lands the they have used all their lives. I hope one day the handicapped access laws find their way into Forest Service "Regulations"! That said, with four, no win Alternatives to choose from, please accept this comment in favor of Alternative 4. Sincerely, Edward Koon 5636 Quartz Ct. Helena, MT 59602	(134-1) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. In all Alternatives motorized opportunities are provided and within those motorized routes there are different skill levels provided for elderly and disabled use.
(135) From: Brad Langsather <blangsather@helenamt.gov> Sent: Thursday, June 12, 2014 8:57 AM To: FS-comments-northern-helena-helena Cc: Amy Teegarden; Donald Clark; Ron Alles; Randall Camp Subject: Divide Travel Plan	

Comments	Response to Comments
U.S.F.S Ranger Heather De Geest: To better protect the City of Helena's municipal water resources, the City would like to request that the following U.S.F.S. roads occurring within the Helena National Forest, Helena Ranger District, Divide Travel Plan project area be considered for yearlong closure to motorized vehicles Route 299-H1 (Crosses the Red Mountain Flume on U.S.F.S. property) Route 299-E1 (Terminates adjacent to the Red Mountain Flume) Route 1863-C1 (Provides motorized access to City property) Route 1876-E1 (Originates on City property) Route 1876-C1 (Originates on City property) (135-1) Additionally, in the event that the aforementioned closures are enacted, the City of Helena would like to request that the City receive authorization to used motorized vehicles for maintenance purposes on Routes 299-H1, 299-E1, 1863-C1, and 1876-C1. (135-2) Please feel free to contact me should questions concerning the City of Helena's requested motorized travel closures arise. Brad Langsather Natural Resource Coordinator City of Helena Office Phone: (406) 447-8454 E Mail: blangsather@helenamt.gov	(135-1) Refer To Alternative 5. (135-2) This is outside of the Divide Travel Plan. Coordinate a meeting with the Special Use Admistrator.
(136) Date Jun 12, 2014 To: Helena National Forest Subject: Draft Environmental Impact Statement for the Divide Travel Plan	(136-1)Decomisioning of closed routes will be determined during implementation. (136-2) Page 161 if the DEIS discusses the Helena National Forest's requirements under the Forest Plan as amended by INFISH with the applicable road standards RF-2 , RF-3 and RF-

Comments	Response to Comments
From: Leonard A. Walch, 1229 Hollins Ave., Helena, Mt. 59601 Below are my comments on the Draft Environmental Impact Statement for the Divide Travel Plan. 1. The decision to limit designations to open and closed for the Forest Service system existing routes and the unauthorized routes does not give the public a clear picture of how resources such as water and fisheries will benefit; rather most of all the ongoing negative effects to watershed and fisheries will continue. From the initial comments from the public which are mentioned in the DEIS it seems the public wants to see how the Forest plans to protect natural resources while providing for the travel network. With the current open closed approach in the DEIS, both the hydrology and fisheries effects sections acknowledge that there is only a small benefit to be gained from the re-vegetation that may occur on a closed road, but both discussions also point out that all the crossings and sediment delivery sites will remain in place for the time being. Without determining whether some of the closed roads will be: decommissioned, placed in long term storage with crossings removed, or left in place for administrative needs it is hard to say how this project is moving forward to address problems for native and listed fish needs or TMDLs. I suggest that wording be added to the Features Common to All Alternatives and the cumulative effects appendix specifically stating that it is reasonably forseeable that planning will begin to determine such things as: which roads will be decommissioned, which roads may be put in long term storage, which roads will be left in place for admin needs, and the priorities for upgrade and maintenance of open and closed roads to reduce their effects on watershed and fisheries.(136-1) Without commitment to complete that additional planning I would maintain that the Forest is not meeting the intent of the minimization statement for the project or the Inland Native Fish Strategy which was amended to the Helena Forest Plan. (136-2) The Biological Opinion that was completed for bull trout on the Helena Forest's Blackfoot Winter Travel Plan required the type of detailed planning discussed above be completed in a timely manner upon implementation of the Blackfoot Winter	4. Relative to this project to administratively chose whether a route is open or closed to motorized use, tables on pages 205, 210, and 214 summarize the miles of high risk roads and crossings that would be closed under alternatives 2, 3 and 4 respectively to help meet these standards. Additionally, a new alternative 5 was added in the FEIS to respond to comments for the DEIS in order to more aggressively addressthe issue of road erosion/sedimentation as a function of high risk roads identified throughout the project area. (136-3) Refer to Appendix E in the EIS. (136-4) Refer To Alternative 5. (136-5) Alternatives 1 and 2 would keep road 227-E1 open above Kading Campground. All other alternatives close this extension. In maintaining consistency with mitigation for open fords in listed bull trout habitat, measures to protect the channel from direct vehicle disturbance until a bridge or similar structure can be installed would be considered as part of the decision for the Divide Travel Project.Hydro/Fish – Design Criteria (136-5) We agree with this comment. Route 227-E1 is hydraulically connected to the Little Blackfoot River and has an increased potential to deliver sediment. In Alternative 5, FSR# 227 would be closed at the turnaround above Kading Campground yearlong to all wheeled-motorized travel. (136-7) Refer To Alternative 5. (136-8) During development of Alternative 5 for the FEIS, these concerns over snowmobile trails and wheeled motorized access

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Travel Plan. Given the importance of many of the drainages in the Divide Travel Project Area to native fish species, the Forest Service should specify the sort of planning discussed above be required to be completed within one year rather than waiting for the Fish and Wildlife Service to require it. 2. I feel it would be useful for the summary of the EIS to address how the issues are addressed by the proposed alternative as well as the other alternatives presented in the document. Regarding concern over effects to natural resources (one of the issues), the DEIS does include the info in the individual specialist reports for a person to sort through. It would be helpful to include some narrative in the summary as to the degree natural resources are protected in the narrative instead of only stating that the laws, regulations and forest plan will be met with the alternatives. 3. Regarding Alternative 2--In the summary (page 6) there is a statement that there are 40 miles closed yearlong, but it is unclear as to how that figure is determined. Are these an overall net miles of closure? It seems like there should be inclusion of some statement that a number of currently closed roads are going to be opened and how those miles compare to miles of road that are open which will be closed. It would be good to try to clearly explain in the narrative the magnitude of full closure and partial closure compared to how much road is fully open and partially open. (136-3) I could not find a clear explanation in the narrative addressing my concern in the main DEIS either. It is left to the reader to try to sort through the tables to determine how the numbers vary by alternative. For clarity to the readers it would be good to include all the alternatives on a single table in the summary chapter with that table showing all the various categories of closures and openings rather than having each alternative shown against the no action alternative in separate tables. Then a narrative could refer to the table and discuss the significance of various changes. 4. Of the four alternatives presented in the DEIS Alternative 3 as presented is the best in that it closes the most roads that pose risk to watershed and fishery resources.	to get to snowmobile unloading points were brought forward into planning. A product from those internal discussions resulted in a map displaying locations of all designated snowmobile parking areas to ensure none would be located that would risk rutting of the road prism on high risk road segments. There are five designated snowmobile parking areas with only one located in the Little Blackfoot River. This parking area is located in the vicinity of the Charter Oak turnoff to avoid high risk road segments beyond that point where rutting due to wheeled vehicle use to reach snowmobile routes would be avoided. (6-136-8) The Hydrology Specialist Report assumes that all routes traveling through the INFISH RHCA have the potential to negatively affect water quality, regardless of vehicle or seasonal restrictions. Without full decommissioning or stabilization, even routes closed to all motorized travel have the potential to deliver sediment to adjacent streams. The Fisheries Specialist Report discusses the increased risk associated with combined over-snow and wheeled vehicle use on routes during winter/spring time thaws. (136-10) Concerns about the Bison Mountain 4104-A1/A2 road were considered in the development of Alternative 5 for the FEIS in that this route and all its stream crossings remain closed to wheeled motorized traffic. Road 495-D1 would remain open with provision to replace the ford crossing on an unnamed tributary to Ontario Creek with a bottomless structure because this tributary supports westslope cutthroat trout. An ATV route would be opened on the north side of the Ontario Creek corridor

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Alt 3 lays the groundwork for potentially reducing the money needed to maintain roads in the long term. As disclosed in the DEIS there is not enough money to adequately maintain the existing road system. Given the guidance to meet minimization of effects, alternative 3 requires the least amount of maintenance funding over the long term since it has the fewest miles of open roads. However, Alternative 3 should be modified to include closure of FS road 227 above Kading Campground and the Kading Grade to eliminate the need to install a stream crossing at an existing ford. Closing the road above Kading will eliminate problems with some of the dispersed camping that occurs above Kading Campground. (136-4) It is important to note is that if an alternative is selected that keeps FS Road 227 open above the Kading Camppground turnaround, then it should be closed at the stream crossing until a crossing structure can be installed in place of the ford to remain consistent with reducing risk for sediment effects to bull trout located downstream in the Little Blackfoot River. (136-5) 5. There is at least one very serious concern with Alternative 4. The use of the 300 foot corridor in alt 4 allows for much more liberal use of the 300 foot area adjacent to open roads such as cutting firewood. Although the mitigation measures specified for use in the 300 foot area suggests there would be acceptable risks for effects, the transportation report in the DEIS (page 115) brings out that off route wood cutting road proliferation is a problem currently. Off route road proliferation would be exacerbated under alternative 4. All alternatives should maintain the restriction that off route travel be limited to dispersed camping and follow the restrictive measures outlined for Alternatives 1-3. If the Alt 4 wording for the 300 foot area is adopted then there will be a need to develop site specific closures to firewood cutting along some streams where the road is close to the stream to fully meet Infish and avoid negative effects to woody debris recruitment to the streams. On the other hand Alternative 4 includes closure of FS road 227 above Kading campground. This is good and would eliminate a ford crossing on the unnamed tributary to the Little Blackfoot River. The selected alternative should include this closure. (136-7) 6. I have a concern over the assumption that winter use poses no risk for negative	to avoid using road 4104-A1. The ATV route is an extension of 495-D1 that eventually crosses Ontario Creek using a bridge or similar structure. The current crossing would remain closed until a bridge is in place. (136-11) Thank you for your comment. (136-12) Best management practices and project design features/mitigation measures would apply to the alternative selected for implementation and would become part of the decision and therefore, non-discretionary. Monitoring, Implementation and Enforcement would be implemented for this project and is discussed in DEIS. We recognize that monitoring motorized use is important to ensure resource impacts are minimized. During the implementation phase of the travel plan, a more detailed implementation plan would be developed to prioritize actions and monitoring. Many of our internal processes (e.g. contract management) automatically build in monitoring. The decision and implementation phase would comply with Forest Plan monitoring requirements for applicable resource areas – particularly those where we are trying to minimize impacts (e.g. recreation/user conflicts, wildlife). (136-13) Refer to Alternative 5. (136-14) Comment addressed in Alternative 5 for the FEIS, which designates trail #359 (Larabee trail) closed to motorized use with no parking lot proposed on the east side of the current crossing at the trailhead. A bridge is proposed for foot/stock traffic at the trailhead to avoid fording the Little Blackfoot River. (136-15) Thank you for your comment.

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effects to fish resources from overwinter snow travel. With regard to the use of the snowmobiles that is a reasonable assumption. However, use of the open Forest roads by wheeled vehicles to get to snowmobile roads and trails can lead to erosion of roads and sediment delivery to streams depending on the snow cover on the roads and weather conditions. This point was addressed in detail in the previously completed fish report and Biological Assessment for Blackfoot Winter Travel. There may be concerns that should be addressed if any roads are open to wheeled vehicle traffic during the snowmobile period that are near bull trout streams and have sediment delivery points. (136-8) With bull trout spawning in March and April there may be eggs in the stream gravels during a period of time when accelerated sediment delivery can occur from snow ruts in the road due to wheeled vehicle use to reach the snowmobile routes. There may be a need to provide some sort of special mitigation measure such as additional erosion control features if there are situations on the ground where the situations I mention above may be applicable for the Divide Travel Project. 7. Opening roads that have long been closed should be reconsidered. For example, given the lack of adequate maintenance funding it is unwise to open a road north of Bison Mountain (4104 A1) which will necessitate crossing Ontario Creek to connect in with FS Road #495D1 as an ATV route. Implementing the opening of this route to ATVs will require substantial capital expenditure for stream crossing structures that provide full aquatic passage on Ontario Creek (which supports bull trout) as well as an unnamed tributary to Ontario Creek on 495D1 that supports cutthroat trout. (136-10) It would be much more protective to the native fishery as well as more efficient and less costly in terms of maintenance over the long term to keep 4104A1 closed and to close 495D1 so high cost stream crossings and maintenance dollars for those crossings will not be necessary. I encourage the Forest to refrain from opening this route. (136-11) 8. Regarding the effectiveness of road closures using signs, monitoring is prescribed for the Divide Project Area—it was also prescribed for the North Belts Travel Plan. Was effectiveness monitored and were the closures effective in the Helena Forest's	(136-16) Thank you for your comment. (136-17) We agree with this comment. The statement in the Forest Plan Consistency section of the Hydrology Specialist Report has been changed to reflect the assumption that there will continue to be a backlog of road maintenance projects. However, a decreased number of open routes will allow for road improvements to be concentrated on roads with water quality concerns. (136-18) Thank you for your input. (136-19) Route improvements will be addressed during implementation. (136-20) To maintain compliance with INFISH standards and the HNF Forest Plan, analyses within the Hydrology Specialist Report have been changed to consider roads within 300 feet of fishbearing streams and 150 feet of non-fishbearing streams when determining road impacts to water quality. (136-21) The statement in the Methodology and Scientific Accuracy section of the Hydrology portion of the final EIS that refers to sediment modeling has been removed. No attempt was made to model sedimentation in the hydrology analysis due to uncertainty in predicting future sedimentation as a result of changes to the open/closed status of roads. (136-22) Thank you for your input.

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North Belts Travel Plan which was implemented a number of years ago? Was a summary report prepared for the North Belts? How can we be sure sign closures will work in the Divide area unless they have been demonstrated to be effective elsewhere on the forest? Please address the likelihood for the effectiveness of sign closures. (136-12) 9. Specific to the ford crossing at Larabee Gulch on the Little Blackfoot. Given that the road is closed on the east side for all the action alternatives there should be no need for a stream crossing except to provide for parking to access the trail. Development of a parking area at Larabee Gulch has been considered by the forest for a substantial period of time. There should be inclusion of a statement that a parking area will be constructed as a cumulative effect in the final EIS. Due to the nature of the site near the crossing, construction of a parking area will require substantial disturbance within the Infish RHCA very close to the Little Blackfoot River and will have long term adverse effects to bull trout. The Infish amendment to the Forest plan states that new developments should not occur in RHCAs unless adverse effects can be avoided. (136-13) Please address how a parking area is compatible with the Infish amendment to the Forest Plan. (136-14) Page specific Comments Page 23 DEIS- Of the two crossings mentioned for an unnamed tributary to Ontario Creek only one is on an unnamed tributary, one of the crossings is actually on Ontario Creek.(136-15) Page 112- the statement regarding 527 C-1 and 4044 E1 as the only roads in the planning area that were recommended to be removed from the system in the Roads Analysis gives the impression that this was a comprehensive conclusion of the Roads Analysis when it really was only the conclusion of the transportation group. There were many roads that were considered to be high risk that could be closed to benefit natural resources. It would be good to clarify this statement to show that it was not an interdisciplinary conclusion that these were the only two roads that	(136-23) Since the original DEIS analysis, updates in the National Hydrography Data forced re-analysis of high risk roads for the FEIS. During that analysis errors in buffering the original stream coverage were discovered, which applied 150 foot buffers for all streams in the fisheries analysis instead of using 300 foot buffers for fishbearing streams and 150 feet for non-fishbearing streams. The FEIS corrects this error to apply the correct INFSH buffers relevant to fishbearing and non-fishbearing streams. (136-24) Thank you for this comment. The values in the tables reporting road miles within 150/300 feet of stream channels have been changed in both the Hydrology and Fisheries specialist reports to reflect recently updated National Hydrography Dataset (NHD) stream spatial data. (136-25) Refer to Alternative 5. (136-26) Refer to the Fish Specialist report. Future site specific analysis will determine closure methods, including decomisioning.

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should be removed from the system. (136-16) Page 115- with statements in the DEIS that maintenance funding is not adequate to maintain the currently open roads (page 113 includes a statement that many local and collector roads receive little maintenance) it seems extremely unlikely that best management practices (BMPS) can be implemented for all road maintenance projects as discussed in the hydrology section on page 160 of the DEIS. With limited funding what would be considered reasonable BMPs? (136-17) Page 115- The statement that most routes are in good condition does not match with statement on page 113 where there is a statement that " many of the older roads are in disrepair" (136-18) Page 116 – the statement that adequate surface and drainage conditions are present on open and closed roads in Area 1 with the exception of Dog Creek is flawed for at least one instance-- Drainage and surface conditions on the road in Spring Gulch (trib to Dog Creek) are very poor. I suspect there are numerous instances where conditions are not good. Discussion for other areas also imply conditions are reasonably good when I know there are specific problems on sections of some roads such as Telegraph Creek and closed roads in the Sally Ann Creek area. I suggest that there should not be general statements suggesting that most of the roads are in good condition when many times the drainage features on the roads have not been maintained for years or even decades (in the case of closed roads). A good way to address specifics of roads in each of the areas would be to include either an appendix or reference to a project file document which summarizes the conditions of each road and when it last received maintenance. (136-19) Page 147 As I commented in the Blackfoot Travel Plan, use of 150 foot as a sediment delivery parameter from roads is not appropriate for streams supporting fish west of the divide where the Infish Amendment to the Forest Plan is in place. Site specific information can be used to adjust the 300 foot Infish buffer. I'd suggest considering using roads within 300 feet as a measure of risk in the	

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hydrology section or use site specific information that supports rationale on any specific road; doing otherwise would seem to be a violation of Infish which is amended to the Helena Plan. If the Forest insists on using the 150 foot parameter for sediment delivery risk I think there needs to be an explanation as to how use of that distance without site specific information meets the intent of the Infish amendment. (136-20) Page 147- There is a statement that sediment modeling was done by the Forest Hydrologist yet on page 144 there is a statement that no sediment modeling was undertaken. Since no sediment data is presented it is assumed that the first statement should be taken out of the DEIS. (136-21) Page 155 -The discussion suggesting benefit from the POTENTIAL for decommissioning should be considered a benefit is flawed. Later NEPA evaluations after the Divide Project is implemented could determine that all closed roads might be necessary for administrative purposes. The closing of roads in the Divide Project would only be beneficial to watershed and fisheries if a decision were to be made in the later nepa evaluations to put the roads in long term storage with crossings removed or the roads were to be decommissioned. (136-22) PageS 149-151. It is confusing that the hydrology report includes tables (3.19 and 3.21) that depict miles of roads within 150 feet of streams and the mileage matches up with table in the fish report (Table 3.27) that show the miles of road within 300 feet of streams. This does not seem very feasible; it would make sense that there are some miles of road between 150 and 300 feet . So are the miles shown in the hydrology and fish reports within 150 or 300 feet? As pointed out elsewhere in my comments the roads within 300 feet of fishery streams should be of concern unless there is site specific information that justifies eliminating them from concern. (136-23) (136-24) Page 188- The inventory of dispersed camping sites in Infish RHCAs should be completed for all the 6th code HUCs. It doesn't seem likely that monitoring of effects at a given site can be effective unless preliminary inventory establishing	

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baseline conditions has occurred. (136-25) Page 191- It would be useful to know how many of the culvert crossings are barriers to fish movement as part of the existing condition, how many are on high risk roads that will remain open, and how many are on high risk roads that will be closed by alternative. This information would help give a feel for the potential benefit or lack of benefit arising from possible decommissioning or long term storage on roads currently closed in this decision.(136-26)	
(137) From: Kylie Paul <kpaul@defenders.org> Sent: Thursday, June 12, 2014 8:48 PM To: FS-comments-northern-helena-helena Subject: Divide Travel Plan - Defenders of Wildlife Attachments: Copeland et al 2010 bio_envelope_wolverine.pdf; Schwartz_et_al_Ecology_2009 _wolverine_gene_flow.pdf; Krebs_etal_2007_Multiscale Habitat Use by Wolverines in British Columbia,.pdf; Heinemeyer and Squires_2013 progress report_Idaho Wolverine-Winter Recreation Project.pdf; HNF Divide Travel Plan_ Defenders of Wildlifecomments.pdf We have attached our comments on the Helena National Forest's Divide Travel Plan Draft Environmental Impact Statement. We have also included several relevant journal articles we'd like to see included within the FEIS. Thank you for this opportunity. Kylie Paul Kylie Paul Rockies and Plains Representative 259 W. Front Street, Suite B Missoula, Montana 59802 Tel: 406-728-8800 Cell:	

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406-370-6979 kpaul@defenders.org | www.defenders.org From: Kylie Paul <kpaul@defenders.org> Sent: Thursday, June 12, 2014 8:49 PM To: FS-comments-northern-helena-helena Subject: Divide Travel Plan - Defenders of Wildlife_large additional ttachment Attachments: Inman 2013 Wolverine Ecology & Conservation in Western US_Dissertation.pdf Please also note this additional attachment that was too large to include with the initial email. Thank you, Kylie Kylie Paul Rockies and Plains Representative 259 W. Front Street, Suite B Missoula, Montana 59802 Tel: 406-728-8800 Cell: 406-370-6979 kpaul@defenders.org | www.defenders.org Missoula Office 259 W. Front Street, Suite B Missoula, MT 59802 tel 406.728.8800 fax 406.728.9490 www.defenders.org	

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June 12, 2014 Heather DeGeest, Helena District Ranger Helena National Forest Attn: Divide Travel Plan 2880 Skyway Drive Helena, MT 59602 Sent via email this date to: FS-comments-northern-helena-helena@fs.fed.us Re: Draft Environmental Impact Statement for Travel Management Planning for the Divide Area of the Helena National Forest Dear Heather DeGeest, Thank you for the opportunity to comment on the Helena National Forest's Divide Travel Plan Draft Environmental Impact Statement (DEIS). Defenders of Wildlife (Defenders) is a national non-profit conservation organization with more than 1.2 million members and supporters nationwide, over 5,000 of whom reside in Montana. Founded in 1947, Defenders focuses on conserving and restoring native species and the habitat upon which they depend. The DEIS is important to several of our focal species—including wolves, grizzly bears, lynx and wolverines— because the area provides significant habitat and serves as linkage between large blocks of undeveloped public lands on either side of MacDonald Pass and Highway 12. With these comments we urge the Helena National Forest (HNF) to ensure that its travel plan maintains and restores these values, fundamental to this area. It is clear that this travel planning area presents some unique management challenges. Blocks of Forest Service lands and several townships north and south of Highway 12 are connected by a thin tendril of national forest right where it crosses the highway, and right along the Continental Divide itself. Looking at the broader landscape north and south along the Divide, the fragility of this connection is even more evident, and in fact this is one of very few east/west "fracture zones" that interrupt otherwise contiguous national forest lands between Yellowstone and Glacier National Park. The outstanding importance of this area far transcends its immediate area and we strongly agree that "Options for movement in the valleys have been substantially reduced and often eliminated by human development. This has placed an emphasis on NF lands along the Divide mountain ranges to provide connectivity" (DEIS p.249). The Divide has the ability to support connectivity for myriad species and this travel plan can provide the right direction in moving towards that goal. We have some specific concerns related to the planning area's	

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ability to serve as a linkage area, providing long-term connectivity. We are also alarmed at the level of winter over-snow motorized use proposed within the plan—though we also recognize there are some areas with significant road and over-snow motorized use closures as well. Below, we detail some specific areas and issues where we have concerns. We broadly support road closures, closures of over-snow motorized vehicles, and increased seasonal restrictions to over-snow motorized vehicles for several roads within various alternatives. However, the seasonal closure date for over-snow motorized vehicles should be moved from the currently proposed May 15 closure to April 1 to protect emerging grizzly bears. Additionally, we are concerned that the DEIS indicates that closure methods would be limited to signs (DEIS p.15). Sign closures have shown to be ineffective at stopping illegal use of closed roads. It is well known that budget constraints on all forests have made it very difficult to effectively monitor and enforce illegal activity on closed roads. Using only signs to close roads would increase the need for effective enforcement and monitoring. The HNF should consider more effective methods that may require less staff time to enforce such as gates, earth moving, etc. (137-1) Nevada Mountain Inventoried Roadless Area The Nevada Mountain IRA has the highest diversity of wildlife species on the Helena Ranger District, and it provides important denning habitat for grizzly bears and essential winter snow conditions for lynx and wolverines. It offers crucial habitat connectivity for those species. Roadless Areas serve as important wildlife refugia and have ever-increasing value to maintaining wildlife populations and enhancing fisheries. IRAs should be managed at their maximum acreage as roadless and motorized vehicle use should not occur in such locations. The Nevada Mountain IRA and all roads within it (including 4044-E1, proposed for opening to snow vehicles) should be closed to all motorized travel, including snowmobiles. This would protect this high value movement corridor and wildlife habitat. This should include portions of Threemile Creek, Georgia Creek, Black Mountain, roadless areas north of Meyers Hill, and Helena Ranger District acres on the east side of the Divide. (137-2)	(137-1) Closure dates were set primarily to accommodate elk, deer, and other ungulate movement patterns. Currently, we do not know of any grizzlies denning anywhere in the Divide landscape, and so have not built closure schedules around them. The most likely denning areas—the upper Little Blackfoot and upper Little Prickly Pear watersheds –are protected by snowmobile area closures. Closure dates can be modified for areas that in the future reveal themselves to be grizzly denning areas.

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Alternative 3, which closes routes and acres to motorized vehicles in the Nevada Mountain IRA, is preferable to Alternative 1, 2, and 4, which do not close the IRA. We support that Alternative 3 reflects the Blackfoot-North Divide Winter Travel Plan, unlike Alt 1, 2, or 4. Alternatives 2 and 4 propose to open non-motorized trails #4044-E1, 4401, 136D-1 (Continental Divide Trail) and 136 007. We oppose the opening of these roads to motorized use, as increasing motorized access in these areas could constrict and prohibit safe travel of wildlife and reduce security. These alternatives also designate the entire Nevada Mountain IRA as snow vehicle (unofficial) play area and thus we do not support those alternatives. (137-3) The DEIS fails to evaluate the combined and cumulative effects of opening those roads. (137-4)	
Additionally, Nevada Mountain is a strong candidate for recommended wilderness in HNF's pending forest plan revision in 2015. The forest planning process will evaluate suitable areas for wilderness potential and recommend areas for wilderness. Wilderness candidate lands that contain motorized travel tend to be negatively affected in their prioritization level for recommended wilderness in forest plan revisions. The Divide Travel Plan will have an important effect on whether Nevada Mountain exists as a viable candidate for wilderness. Alternatives 1, 2 and 4 would likely dramatically reduce the ranking Nevada Mountain would receive as a proposed wilderness. (137-5)	(137-2) Refer to Alternative 3. The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities.
Under the final selected alternative, the HNF should ensure that the Nevada Mountain IRA is closed to over-snow motorized vehicle routes and areas to support increased habitat security and movement patterns for grizzly bear, lynx and wolverine. (137-6)	(137-3) Thank you for your comment.
Other Areas Additionally and for similar reasons, we urge the HNF to manage all Electric Peak roadless lands along the Continental Divide between Bison Mountain and Ontario Creek headwaters as a year-round non-motorized area. Logging roads in Monarch Creek should remain/be closed (FR#4104). Thus, Alternative 3 is the better alternative selection since it closes the number of miles open to wheeled motorized vehicles. However, no alternative offers a reduction of over-snow motorized	(137-4) Refer to Alternative 5. (137-5) Thank you for your comment.

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vehicles in the Electric Peak IRA. (137-7) In the Jericho Mountain IRA, we support the reductions in the numbers of acres open to over-snow motorized vehicles in Alternative 3 and 4. (137-8) The MacDonald Pass area is an important linkage zone for lynx, wolverines, and grizzly bears and other wildlife. We support road closures and seasonal restrictions to over-snow motorized vehicles in that area, and we do not support areas opened to over-snow motorized vehicles in this habitat pinch point region. (137-9)	(137-6)Refer to Alternative 5.
Minimization Executive Orders (EO) 11644 and 11989 require the Forest Service, when designating ORV trails and areas, to minimize harassment of wildlife, including grizzly bears, lynx, and wolverines, and significant disruption of their habitat. The Travel Management Rule (TMR) at 36 C.F.R. § 212.55(b) echoes this minimization requirement. Courts have found that the Forest Service has an affirmative obligation to actually show that it aimed to minimize damage when designating motorized trails and areas. Critically, the agency must demonstrate that proposed management decisions comply with ORV EOand TMR policy, rather than simply disclose anticipated impacts from the designation. Specifically, in this case the Forest Service must document and explain how the alternatives meet the criteria to minimize harassment of grizzly bears, lynx, wolverines and disruption of their habitat. (137-10)	137-7)Refert to Alternative 5. (137-8) Thank you for your comment.
Instead of providing a thorough analysis of how it will minimize impacts from motorized use, the DEIS states: “For the purposes of this planning effort, the HNF interprets the term ‘minimize’ to mean meeting the Forest Plan standards, moving forest resources toward the goals and objectives described in the Forest Plan…” (DEIS p.15). This interpretation incorrectly conflates the minimization duty with other substantive standards set forth by NFMA and the Forest Plan. The minimization duty is a unique mandate and not satisfied through the use of other standards as a proxy. First, the Helena Forest Plan was not designed to minimize impacts as contemplated by the ORV EOs. Rather, the Forest Plan was developed under the separate and independent authority established in Section 6 of the NFMA which establishes that a Forest Plan is to provide for multiple use and sustained yield of goods and services from the National Forest System. Indeed the	(137-9) Refer to Alternative 5.

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TMR specifically segregated the travel management process from the forest planning process in order to ensure that the minimization criteria were adequately addressed, something that had not been done in prior planning processes. Promulgating a separate regulation to specifically manage motorized use on national forest lands indicates that providing for multiple use and sustained yield is not the same thing as minimizing motorized recreation impacts. The ORV Executive Orders and the Travel Management Rule place an additional layer of restrictions upon that multiple use mandate. Minimizing motorized recreational impacts is, in fact, an additional analysis that must be completed on a site specific level before designating motorized use. Furthermore, by law, all action alternatives must be consistent with the Forest Plan, thereby making it impossible that mere compliance with the forest plan standards and guidelines would also necessarily mean that the minimization criteria were adequately applied. If we apply the FS's logic that merely achieving consistency with the Forest Plan equates to minimizing impacts, we must then conclude that every action alternative presented in travel management plans necessarily minimize impacts, which on its face is absurd and ignores the fact that each substantive requirement of federal law is written differently and requires a different type or level of compliance. Clearly, an alternative that designates many more motorized routes near streams would have more impacts to water, fish, wildlife, and aquatic systems than an alternative that has few routes in these sensitive locations, even if both alternatives are consistent with the Forest Plan. Similarly, an alternative that designates many more motorized routes in ungulate habitat will have greater impact on wildlife habitat than an alternative that does not, even if both alternatives meet Forest Plan standards. As opposed to using the Forest Plan as a proxy for compliance with the ORV EOs, the FEIS should demonstrate how each alternative is consistent with minimization criteria. The DEIS acknowledges that alternatives will have a range of potential effects on grizzly bears, wolverine, lynx and their habitat. The FEIS should present analysis that justifies how each alternative meets the ORV EOs and TMR, instead of relying on the Forest Plan as proxy. Gradation of harm to grizzly bears, wolverines and lynx must be contemplated and minimized in the FEIS and subsequent decisions	(137-10)Wildlife - analysis

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to demonstrate compliance with the ORV EOs and TMR. (137-11) Grizzly Bears Alternative 3 most appropriately recognizes the needs of grizzly bears. However, there are some specific concerns we have with this alternative. The planning area encompasses the southern expansion range of the occupied Northern Continental Divide Recovery Zone and Ecosystem (NCDE). This area provides vital linkage between core grizzly bear habitat in the NCDE and undeveloped public lands south of Highway 12 and onwards towards the Greater Yellowstone Ecosystem (GYE). Genetic (male) and eventually functional (female) connectivity is imperative to long term sustainable recovery and resiliency of lower 48 grizzly bears. In regards to grizzly bear security we are concerned that significant portions of the area are proposed for over-snow motorized vehicle use until mid-May. Female grizzly bear activity and denning has been documented in the Nevada Mountain area and extensive OSMV of the area is currently proposed. Grizzly bears can be susceptible to disturbance at their den sites, can be easily awakened and disturbance has been found particularly in the spring when females and cubs of the year are still present (Mace and Waller 1997). Grizzly bears in the NCDE typically den from October or November, with females and cubs emerging from their dens early April-early May. To avoid den disturbance, abandonment and area avoidance of females with cubs in the spring, the seasonal closure date for over-snow motorized vehicles should be moved from the currently proposed May 15 closure to April 1. We reiterate that allowing extensive snowmobile and winter access in areas where grizzly bears are denning is detrimental to grizzly bear security. (137-12) IGBC Guidelines – Use of MS5 We are concerned that the HNF assumes that it is appropriate to use Interagency Grizzly Bear Committee (IGBC) Management Situation #5 (MS5) as the appropriate management situation for southern distribution. As stated in the IGBC Guidelines “The value of the Management Situation concept for grizzly bear management is most fully realized with the proper stratification and implementation.” Given the Divide’s potential to act as a corridor or linkage area between the NCDE population and the Yellowstone Ecosystem we highly recommend that that the HNF reassess the use of MS5 and appropriately consult with the U.S. Fish and Wildlife Service and Montana Fish, Wildlife and	(137-11)Wildlife - analysis

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Parks on the most appropriate Management Situation. The use of MS5 flaws baseline analysis of the planning area, specifically in regards to the Nevada Mountain area. Alternative 3 does appear the most compliant with the needs of grizzly bears and reflects potential management direction under a more appropriate MS situation. (137-13) Food Storage Order The Beaverhead-Deerlodge National Forest implemented a Food Storage Order June 1, 2014 for the "purpose of minimizing adverse interactions between bears and humans…" This order is effective March 1-December 1. While it is not within the scope of this planning document, it would be prudent for the HNF to institute a similar order. This portion of the Helena National Forest is within the Draft Northern Continental Divide Grizzly Bear Conservation Strategy identified Zone 2 and the only Forest area without a Food Storage order (137-14). Additionally, dispersed camping and motorized use is allowed within 300-foot buffers of roads and trails, increasing potential for camping sites with uncontained attractants to be scattered throughout the planning area. It is widely known that a primary source of conflicts between people and grizzly bears is correlated to the availability of anthropogenic attractants like coolers, garbage and game. Dispersed camping as is present in the HNF, invites conflict. Food Storage Orders on other Forest lands have successfully minimized these conflicts resulting in a safer environment for wildlife as well as forest-users. Wolverines The HNF and the Divide travel planning area is an important area for wolverines, particularly as an important component of core wolverine range and travel in the Northern Rockies region (Inman 2013). This underscores the potential of this travel plan to significantly affect wolverines. The wolverine analysis of biological factors, habitat, and occurrence, while accurate in most areas, does not use the most recent best available science.(137-15) Numerous sources that provide additional and perhaps improved information were not included (i.e. Schwartz et al. 2009; Copeland et al. 2010; Inman 2013). We have attached those for inclusion into the public record. We support the statements within the DEIS that impacts to wolverine natal denning habitat typically come from snowmobile activity (and likely other dispersed	(137-12) The Nevada Mountain area where grizzly denning activity has been documented is not part of the Divide Travel Plan Area. If such sites are identified within the Travel Plan Area, adjustments to snowmobile closure dates can be made. Currently, we have no indication of grizzly bear denning in areas used by snowmobiles anywhere in the Travel Plan Area. (137-13) The rationale for using IGBC management situation (MS) 5 is discussed in the Wildlife Background Report (p. 84). As noted, this MS is an imperfect fit for the Divide landscape as it now exists. But, this is not the driving management instruction for the landscape, which is provided by more recent research and direction associated with the recognition of the expanded Grizzly Bear Distribution Zone (Wildlife Background Report, p. 84-89, 184-187).

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backcountry recreation activities such as skiing). The best available science reveals that dispersed recreational activities, particularly winter recreational activities, have the potential to result in negative impacts of wolverine because they disrupt and limit use of wolverine natal denning areas (Carroll et al. 2001, Rowland et al. 2003, May et al. 2006, Copeland et al. 2007, Krebs et al. 2007). The DEIS notes that "Locally, a number of potential wolverine safe havens exist in the travel planning area both as Inventoried Roadless Areas and as undesignated blocks of non-motorized habitat where human presence is minimal for much of the year. Such blocks larger than 1,500 acres occupy roughly 67% of the travel planning area (see discussion of Habitat Connectivity in the Divide Landscape)" (DEIS p.303). It should be asserted that wolverines have vast home ranges between 73 sq. km and greater than 950 sq. km (Schwartz et al. 2009), so it is important to recognize that wolverines use areas far beyond inventoried roadless areas and other such regions. (137-16) Similarly, while wolverines may be "drawn to relatively large blocks of habitat, abundantly forested, in which human presence is minimal" (DEIS p.383) it does not mean they do not regularly use other areas that do not meet that definition, as they continually traverse across their home ranges that contain a range of levels of human activity and impacts (Heinemeyer and Squires 2013). It is thus important that the FEIS considers impacts to wolverines beyond those just within the habitat blocks. This is particularly true when "wolverines are renowned for their vulnerability to trapping and susceptibility to over-harvest (Claar et al. 1999)" (DEIS p.383). It is not just roads but any access via snowmobiling that puts wolverines at risk from trapping (whether direct or incidental), since the trapping season is during the winter and snowmobiles are frequently used by trappers. Additionally, while natal and maternal denning habitat is essential to protect, denning female wolverines will undoubtedly have home ranges that extend beyond those USFS-modeled denning habitat acres (Heinemeyer and Squires 2013), so impacts to denning can extend beyond those denning habitat acres. The statement "A perusal of these areas on Divide travel plan alternative maps indicates that none of them supports snowmobile trails or known snowmobile play areas close enough to potential denning sites to be of concern" (DEIS p.383) must include some level of measurement to provide the reader with	(137-14) This is beyond to scope of the Divide Travel Plan. (137-15) Analysis of wolverine in the Wildlife Background Report and FEIS makes use of the most recent research cited here.

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what the USFS considers and does not consider a distance 'of concern.' We expect the FEIS to address this issue. (137-17) Similarly, wolverines near the Divide travel plan area in the Dalton Mountain, Beaver Creek, and Nevada Creek areas of the Lincoln Ranger District have been documented by Wild Things Unlimited in a unique, relatively low-elevation habitat for wolverines (Gehman et al. 2014). Wolverine kits have been documented, indicating reproduction happening in that region. Thus, denning habitat may be more extensive than represented within models and previous literature. The DEIS states that "The HNF has mapped natal denning habitat for wolverines across the Forest using a model developed by the USFS Northern Regional office (Missoula). The model focuses on identifying high mountain basins, rockslides, steep slopes, and other alpine terrain where woody and rocky debris along with deep snow are likely to accumulate [sic]"(DEIS p.303). This model must be referenced. What model is this? When was the model created? When did the modeling occur? This information would help us better understand the next component of the wolverine analysis, which notes that "as the current Regional habitat model has not identified any wolverine denning habitat in the Divide landscape, this parameter has been approached qualitatively. (137-18) Fieldwork suggested areas that might provide viable denning sites, and the potential for snowmobile presence was then inferred from travel plan alternative maps and the Helena RD Snowmobile Trail map (2003)" (DEIS p.233). We support that the HNF recognized that wolverines persist on the landscape despite the model indicating there may be no denning habitat there. The accuracy of the model, however, perhaps should be called into question. More information about this model should be included within the FEIS. (137-19) Finally, the DEIS indicates that wolverines have persisted on the landscape for years, and they may appear to be increasing. The HNF concludes that therefore refuge habitat appears adequate and that circumstances under Alternative 1, No Action indicate "no wolverine denning habitat is threatened by current patterns of snowmobile use or other winter recreation in the Divide landscape" (DEIS p.384). The DEIS goes on to assert that since active snowmobile trails would remain unchanged in each of the travel plan alternatives, there is therefore no threat to	(137-16, 137-17, 137-18, 137-19, 137-20) The Wildlife Background Report (p. 100-104, 204-209) and equivalent sections of the FEIS address most of these issues. We know we have wolverines resident in the Divide landscape—2 adult males—but we have no evidence of breeding so far. We do not rely on the Regional model of potential denning habitat for identification of sites on the Helena NF because it is generalized and not geared to "eastside" habitats. Field observation indicates that a number of species (goshawks, lynx, and wolverines among them) deviate from standard "Westside" norms in behavior and habitat use. So, we expect that we have wolverine denning habitat in the landscape, but because there has been no detectable breeding/denning so far, we don't know what it looks like. But, as noted in the Wildlife Background Report , there is no snowmobile use in the most likely areas. If breeding is detected,we may need to adjust snowmobile routes accordingly.

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wolverine denning habitat. Whether or not changes are proposed in the travel plan alternatives, the DEIS is obligated to consider the effects of the proposed action on wolverines across the planning area overall. If harm is occurring under current conditions, this should be analyzed in the NEPA process and alternatives considered. We urge that monitoring and research is used to come up with such conclusions of no impact from snowmobile use, rather than a potentially false logic pattern. (137-20) With wolverines in mind, we support the increases in each alternative of areas closed to off-trail snowmobile use, and we particularly support Alternative 3 for its increase of non-motorized refuges. Alternative 3's significant reduction of Nevada Mountain IRA to over-snow motorized vehicles is particularly important. (137-21) Connectivity The DEIS provides a connectivity analysis, grizzly bear analysis, and elk security analysis of non-motorized habitat blocks of different sizes, then qualitatively compares the number of acres of 'potential refuges' in the planning area per alternative (i.e. DEIS p. 384). Yet, there is no mapping that allows a visual comparative analysis of where these blocks occur and whether they support quality habitat for wildlife, for which these 'potential refuges' are analyzed for effects in this DEIS (i.e. wolverines). Our concern is that these 'refuges' could become islands if they are not sufficiently connected. The FEIS must include mapping that shows where these habitat blocks occur, and how they are connected for each alternative. (137-22) Lynx The planning area is undoubtedly an important region for lynx, acting as core habitat and important linkage movement areas. Lynx are also undoubtedly impacted by over-snow vehicle use. We are concerned about the phrasing in the assessment of impacts by each alternative that states: "no expansion of existing non-designated play areas is likely" or "is foreseen," then referenced with a personal communication (DEIS p.375). This does not indicate a comprehensive analysis was considered regarding the likely increase of snowmobile use and capacity of over-snow machines with increasing technologies. (137-23)	

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With lynx in mind, we support the increases in each alternative of areas closed to off-trail snowmobile use, and we particularly support Alternative 3 for its increase of non-motorized refuges in larger habitat blocks. Conclusion We extend our appreciation to the Forest Service for the opportunity to provide these comments regarding the DEIS for the Divide TMP process. Your efforts to engage and educate the public in this process through meetings, phone conversations have been truly appreciated. Our intent in providing these comments is to work cooperatively with the Forest Service and the larger interested public to ensure that the HNF–as a public trust resource–is properly managed for the long-term public interest for the benefit of existing and future generations. The Divide TMP effort offers an important opportunity to provide connectivity for a myriad of species and real restoration of a fragmented landscape. We urge the HNF to make the improvements to Alternative 3 that we've suggested in this letter and pick this alternative in the record of decision. This would ensure that effective habitat protections are in place while also providing sufficient opportunities for variable types of recreation and access. We look forward to working with the Forest Service as the TMR implementation process moves forward. We are available to discuss our comments and concerns raised in the letter. Sincerely, Kylie Paul Rockies and Plains Representative Defenders of Wildlife Erin Edge Rockies and Plains Representative Defenders of Wildlife Attachments: Schwartz et al. 2009; Inman 2013; Copeland et al. 2010; Heinemeyer and Squires 2013; Krebs et al. 2007	(137-21) Refer to Alternative 5. (137-22) Maps of elk security areas under different alternatvies provided in the FEIS and the Wildife Background Report (Figures 7-11, p. 168-173) give a sense of how unroaded enclaves are distributed—although this is the most restricted version of these non-motorized areas (Table 36). A perusal of Travel Plan maps for different alternatives also provides an indication of how unroaded blocks are situated. Some of these blocks are more island-like than others, depending on the use levels of intervening roads. Roads such as Highway 12 or the Rimini Road are obvious impediments, but other routes, such as those illustrated in photos 6, 8, an 9 in the Wildlife Background Report are much less problematic to wildlife on the move. As discussed in the Background Report (p. 142), developing larger unroaded habitat patches is more effective than trying to maintain pristine corridors between them. (137-23) Such impromptu use cannot be predicted. We need to

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Literature Cited Carroll, C., R.F. Noss, and P.C. Paquet. 2001. Carnivores as focal species for conservation planning in the Rocky Mountain Region. Ecological Applications 11 (4):961-980. Copeland, J. P., J. M. Peek, C. R. Groves, W. E. Melquist, K. S. McKelvey, G. W. McDaniel, C. D. Long, and C. E. Harris. 2007. Seasonal habitat association of the wolverine in central Idaho. Journal of Wildlife Management 71:2201–2212. Copeland, J. P., et al. 2010. The bioclimatic envelope of the wolverine: Do climatic constraints limit their geographic distribution? Canadian Journal of Zoology 88:233–246. Gehman, S., K. Baughan, and B. Robinson. 2014. Snow-tracking surveys on the Helena National Forest: December 2012-March 2013. Wild Things Unlimited. Heinemeyer, K., and J. Squires. 2013. Idaho wolverine–winter recreation research project: investigating the interactions between wolverines and winter recreation. 2013 progress report. Round River Conservation Studies, Salt Lake City, Utah, USA. Inman, R. M. 2013. Wolverine ecology and conservation in the western United States. Dissertation, Swedish University of Agricultural Sciences, Uppsala, Sweden. Interagency Grizzly Bear Committee Guidelines. 1986 Krebs, J., E. C. Lofroth, and I. Parfitt. 2007. Multiscale habitat use by wolverines in British Columbia, Canada. Journal of Wildlife Management 71:2180–2192. Mace, R.D., and J. S. Waller. 1997. Final Report: Grizzly Bear Ecology in the Swan	monitor what goes on and then restrict it if it gets out of bounds.

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Mountains, Montana. Montana Fish, Wildlife and Parks. Helena, MT. Unpublished data. May, R., A. Landa, J. van Dijk, J.D.C. Linnell, and R. Andersen. 2006. Impact of infrastructure on habitat selection of wolverines Gulo gulo. Wildlife Biology 12(3):285–295. Rowland, M. M., M. J. Wisdom, D. H. Johnson, B. C. Wales, J. P. Copeland, and F. B. Edelmann. 2003. Evaluation of landscape models for wolverine in the interior Northwest, United States of America. Journal of Mammalogy 84:92–105. Schwartz M. K., J. P. Copeland, N. J. Anderson, J. R. Squires, R. M. Inman, K. S. McKelvey, K. L. Pilgrim, L. P. Waits, S. A. Cushman. 2009. Wolverine gene flow across a narrow climatic niche. Ecology 90:3222–3232. U.S. Fish and Wildlife Service. Draft NCDE Grizzly Bear Conservation Strategy. 2013.	
(138) From: Sarah Peters <speters@wildearthguardians.org> Sent: Thursday, June 12, 2014 1:55 PM To: FS-comments-northern-helena-helena Subject: Divide travel plan comments Attachments: Divide DEIS comments_WildEarth Guardians.pdf Please find attached WildEarth Guardians comments on the Divide travel plan. Please let me know if you are unable to open the document or have questions about the concerns we have raised. Thank you, Sarah A. Peters	

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Program Attorney, WildEarth Guardians - - - - - - WildEarth Guardians protects and restores the wildlife, wild places, wild rivers, and health of the American West. WILDEARTH GUARDIANS A FORCE FOR NATURE SARAH PETERS PROGRAM ATTORNEY speters@wildearthguardians.org 541-345-0299 WildEarth Guardians | PO Box 50104 | Eugene, OR 97405 www.wildearthguardians.org WILDEARTH GUARDIANS A FORCE FOR NATURE 25 YEARS	

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June 12, 2014 Helena National Forest Heather DeGeest, Helena District Ranger 2880 Skyway Drive Helena, MT 59602 comments-northern-helena-helena@fs.fed.us Dear Ms. DeGeest: We appreciate the opportunity to submit the attached comments in response to the Draft Environmental Impact Statement (DEIS) for travel management in the Ten Mile drainage, Little Blackfoot drainage, and area towards Meyers Hill of the Helena National Forest (HNF). The area in question is approximately 155,500 acres within the Lewis and Clark and Powell Counties. The Divide Travel Area is popular for recreation throughout the year due to the close proximity to local communities. WildEarth Guardians is a non-profit conservation organization that works to protect and restore the wildlife, wild places, wild rivers, and the health of the American West. Guardians has over 35,000 members and e-activists. Travel management decisions in Montana, and particularly those that impact sensitive species such as grizzly bear, lynx, and wolverine, are key elements to our on-going work in Montana, and on the Helena Nationa lForest. I. Summary of comments For true minimization of motorized recreational impacts to take place, the HNF must go beyond the Proposed Action-Alternative 2, and adopt more roads for decommissioning, rather than just closure or conversion to motorized trail, as well as provide increased protections for wildlife and roadless areas from motorized use. Public comments made during the scoping period should be better incorporated into any proposed action to achieve management objectives. Minimization efforts and	

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baseline assessments are not meeting federal regulations in the proposed action. II. Executive Orders 11644 and 11989 and the Travel Management Rule Minimization Requirements Throughout our comment letter, we will be invoking the minimization requirements in Executive Orders (EOs) 11644 and 11989 and the Travel Management Rule (TMR). We want to bring your attention to numerous important judicial decisions that impact your analysis and decision making on the Divide TMP process. The Eastern District Court of PO Box 50104 Eugene, OR 97405 541-345-0299 fax 505-213-1895 www. DENVER • EUGENE • LARAMIE • MISSOULA • PORTLAND • SAN DIEGO • SANTA FE • SALT L California issued a decision regarding off-road vehicle (ORV) designations that has application to the TMP process.1In addition ,in the past two years, three other decisions have been issued that also are relevant to your ongoing planning efforts: two Idaho district court decisions related to TMP challenges issued on the Salmon-Challis and Sawtooth National Forests2, and a Montana district court decision issued in 2012 ruling on challenges to the Beaverhead- Deerlodge National Forest Land and Resource Management Plan (LRMP).3 Back ground EOs 11644 and 11989 require that the Forest Service, when designating ORV trails and areas, minimize damage to forest resources, disruption of wildlife, and user conflicts.4 The TMR at 36 C.F.R. § 212.55(b) echoes this minimization requirement for both summer and winter off-road vehicle use,5 stating that: ...[I]n designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing: (1) Damage to soil, watershed, vegetation, and other forest resources;	

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(2) Harassment of wildlife and significant disruption of wildlife habitats; (3) Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and (4) Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands. 1 Central Sierra Environmental Resource Center v. US ForestService, Civ. No. S-10-2172 KJM-AC (E.D. CA 2012). 2 Idaho Conservation League v. Guzman , 766 F. Supp. 2d 1056 (D. Idaho 2011) and The Wilderness Society v. U.S. Forest Service, Case No. CV 08-363-E-EJL(D. Idaho 2012). 3 Wildlands CPR v. U.S. Forest Service, Case No. CV 10-104-M-DWM (D. Mont. 2012). 4 Executive Order 11644 as amended by 11989 states that: [Forest Service]regulations shall direct that the designation of[off- road vehicle]areas and trails will be based upon the protection of the resources of the public lands, promotion of the safety of all users of those lands, and minimization of conflicts among the various uses of those lands. The regulations shall further require that the designation of such areas and trails shall be in accordance with the following—(1) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, or other resources of the public lands. (2) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. (138-1) (3) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors... The Executive Orders define off-road vehicles as "any motorized vehicle designed for or capable of cross-country travel on or immediately over land, water, sand, snow, ice, marsh, swampland, or other natural terrain..." 5 Regarding over-snow designations, 36 CFR 212.81(c) indicates that the TMR minimization criteria must be applied when over- snow vehicle use is "restricted or prohibited." The ORV Executive Orders provide a broader application of the	(138-1) Many of the route closures proposed in different action alternatives are designed to alleviate site- specific habitat and disturbance issues with wildlife. See, in particular, Wildlife Background Report, "Local Effects in Key Areas" (p. 242-282).

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minimization criteria, requiring minimization when any off road vehicle use is allowed, including over-snow vehicles. New regulations to address over-snow vehicle management are currently being promulgated by the Forest Service. In the interim, the Executive Order minimization criterion applies. The California and Idaho cases involved challenges to TMPs where plaintiffs charged that the Forest Service failed to comply with the minimization requirements in the TMR and the EOs. The Montana case involved a challenge to an LRMP where plaintiffs charged that the Forest Service, in designating over- snow vehicle trails and areas, also failed to comply with the minimization requirements. Court Findings Travel Management Rule Minimization Requirements. Related to the TMR requirement to minimize impacts when designating ORV trails and areas, the California and Idaho courts found that the Forest Service has an affirmative obligation to show that it aimed to minimize damage and conflict when designating trails and areas. Specifically, the Eastern District Court of California concluded that: This court reads the language of Subpart B [of the Travel Management Rule] as imposing an affirmative obligation on the Forest Service to actually show that it aimed to minimize environmental damage when designating trails and areas. While the final outcome of the Forest Service's designation process may not necessarily minimize environmental damage to the greatest extent possible, the Forest Service must show that it satisfies the objective of minimizing environmental impacts. This means the Forest Service must do more than merely consider those impacts. Opinion p. 20. The opinion goes on in detail about why NEPA analysis, by itself, is not necessarily sufficient to meet the showing of minimization required by the TMR: Unlike NEPA, which requires agencies to assess environmental consequences of their decisions but does not obligate agencies to take actions that minimize those consequences, the TMR requires the Forest Service to aim to minimize	

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environmental damage when designating routes. Opinion. 23. In the Salmon-Challis case, an Idaho district court similarly concluded that the Forest Service must consider the “minimization” criteria set out in 36C.F.R. § 212.55(b) and document how the agency applied the criteria in its designations on the record: The language “with the objective of minimizing” means that the whole goal or purpose of the exercise is to select routes in order to minimize impacts in light of the agency's other duties. Simply listing the criteria and noting that they were considered is not sufficient to meet this standard. Instead, the Forest Service must explain how the minimization criteria were applied in the route designation decisions. 766 F.Supp.2d 1074 Enforceability of Executive Orders. In the Sawtooth and Beaverhead-Deerlodge cases, the issue of whether EOs 11644 and 11989 are enforceable through a private right of action was raised. In both cases, the courts found that they were. From the Sawtooth case: Having reviewed these Executive Orders and based on the reasoning in Western Watersheds, the Court finds the Plaintiffs can challenge the Defendants’ compliance with Executive Orders 11644 and 11989. Opinion, p. 42. The Beaverhead-Deerlodge case addressed the enforceability issue in the context of winter designations in an LRMP, and ruled that the EOs are enforceable by private parties. See Opinion, p. 31-21. Application to the Divide TMP Process Multiple district courts have found that the EOs and the TMR require the Forest Service to demonstrate that it minimized – not just considered – impacts when designating ORV trails and areas.	

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In the DEIS, the Forest Service purports to address the minimization criteria, stating that it has considered the potential effect of the trail designations with the objective of minimizing those effects as required under 36 C.F.R. § 212.55(b). DEIS at 15. It goes on to say that its approach of complying with the minimization criteria is to ensure the TMP is meeting Forest Pan standards, moving forest resources toward the goals and objectives described in the Forest Plan, and complying with all state and federal regulations which would diminish the impacts of the effects on Forest resources. Summary at 15. It goes on to say that because all of the action alternatives considered would meet these requirements, the effects on Forest resources would be satisfactory minimized by any of the plans. DEIS at 15-16. These conclusory statements re: minimization is insufficient to meet the requirements of the Executive Orders and TMR, and must be remedied before a final decision is reached. We reject this reliance on other substantive standards as a proxy to satisfy 36 C.F.R. § 212.55(b). First, we reject the assumption that the agency's decision comports with these other substantive standards, in particular the Endangered Species Act. Second, the Forest Service makes the mistake of conflating the minimization duty with other substantive standards. Each substantive duty is written differently and words mean different things, in particular relative to the agency's responsibilities. For example, a route designation might conform to a water quality standard providing that sediment loading must be reduced below a particular threshold. But designating that route may not, in fact, minimize impacts because it could be better sited (or managed through, e.g., installation of a culvert) to reduce impacts even further, thereby protecting (i.e., minimizing impacts to) water quality even more than is required by the Clean Water Act. The Forest Service's conflation of separate and independent duties into a muddled, indistinct 'soup' is thus problematic and, ultimately, arbitrary and capricious. Building on this point, the Helena Forest Plan is not designed to minimize impacts as contemplated by the ORV Executive Orders. Rather, the Forest Plan was developed under the separate and independent authority established in Section 6 of	

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the National Forest Management Act; Section 6 provides that a Forest Plan is to provide for multiple use and sustained yield of goods and services from the National Forest System. Indeed, the Travel Management Rule segregated the travel management planning process from the forest planning process, hinting at the fact that providing for multiple use and sustained yield is not the same thing as minimizing motorized recreation impacts. The ORV Executive Orders and the Travel Management Rule place an additional layer of restrictions upon that multiple use mandate. Minimizing motorized recreational impacts is, in fact, an additional analysis that must be completed before allowing recreational use on as ite specific level, even if that use is in an area allocated as potentially appropriate for that use in a programmatic forest plan. And, by law, all action alternatives—or at least those action alternatives that can be chosen for implementation—must necessarily be consistent with the Forest Plan. Accordingly, there may be several different alternative management regimes, all consistent with the Forest Plan, but only one, upon comparative analysis, that actually "minimizes" impacts. (138-2) If we apply the Forest Service's logic that merely achieving consistency with the Forest Plan equates to minimizing impacts, we must then conclude, as the HNF has done here, that every action alternative presented in travel management plans necessarily minimize impacts, which on its face is absurd and ignores the fact that each substantive requirement is written differently and requires a different type or level of compliance. Clearly, an alternative that designates many more motorized routes near streams would have more impacts to water, fish, wildlife, and aquatic systems than an alternative that has few routes in these sensitive locations, even if both alternatives are consistent with the Forest Plan. Similarly, an alternative that designates many more motorized routes in ungulate habitat will have greater impact on wildlife habitat than an alternative that does not. In addition, even if compliance with forest plan standards could show that minimization criteria have been met, the HNF has failed to comply with all relevant	(138-2) Thank you for your comment.

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forest plan standards, particularly those relating to big game, lynx, and grizzly bear management. The Forest Service must show that it has actually minimized impacts per the minimization criteria, and not rely merely on consistency with the Forest Plan as a proxy for compliance with the separate and independent duty to minimize impacts. This requires the agency to, at the very least, conduct a comparative analysis of the action alternatives considered and to then, on the basis of the District Court decisions and a hard look analysis, and provide a rationale for how and why the alternative selected meets these mandates. III. Motorized Dispersed Camping and Game Retrieval This decision would allow cross-country motorized big game retrieval (MBGR) for all hunters and motorized dispersed camping to occur up to 300 feet from a designated route. This exception to the ban on cross-country travel is not applied sparingly and is thus in violation of Forest Service guidance and the TMR. We are extremely concerned that the exception to the ban on cross-country travel for motorized game retrieval and camping does not address the need to prohibit motorized off-road travel to protect natural resources and does not adequately protect wildlife and wildlife habitat. (138-3) The expansive application of the exemption for MBGR and motorized camping does not meet the requirement that the Forest must "[a]pply the provision for big game retrieval and dispersed camping sparingly . . .." FSM 7703.11(4) (138-4) (emphasis added). As explained in the Federal Register notice announcing the dispersed camping rule: "Responsible officials may include in the designation the limited use of motor vehicles within a specified distance of certain designated routes, and if appropriate within specified time periods, solely for the purposes of dispersed camping or retrieval of a downed big game animal . . .." 73 Fed. Reg. 74,612, 74,612-13 (Dec. 9, 2003) (emphasis	(138-3) Refer to Alternative 5. (138-4)Refer to Alternative 5.

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added). Similarly, the "Department expects the Forest Service to apply this provision sparingly, on a local or Statewide basis, to avoid undermining the purposes of the final rule…" 70 Fed. Reg. 216 68285 (Nov. 9, 2005). The Forest may not simply designate a motor vehicle exception for all, or a large number, of routes. The Federal Register notice also makes clear that the use of this exception to the ban on cross-country travel is in no case required to be used. Id.	
The plain language of the rule, the "sparing" and "limited" application of this exception to the ban on cross-country travel must necessarily be with the designations themselves, not the anticipated use. This understanding is also supported by the fact that the anticipated use of MBGR areas is hypothetical and largely out of Forest Service control, while the restriction within the designation is within the control of the Forest Service. Center for Biological Diversity et al. Page 14 of 46 11/05/012	(138-5) Refer to Alternative 5.
Even if the proposed expansive MBGR and motorized camping provisions could be adopted as a substantive matter, the procedures required to do so would be onerous and far beyond what has either been completed or contemplated. First, complementary to the requirement that MBGR be designated sparingly, the rules mandate that the Forest "[a]pply the provision for big game retrieval and dispersed camping sparingly after conducting travel analysis and appropriate site-specific environmental analysis and public involvement." FSM 7703.11(4) (emphasis added). Accordingly, the Forest Service would have to do site-specific analyses under NEPA for all these areas that are within 300 feet of a motorized trail or road, not just for designated roads and motorized trails. This would require the standard "hard look" under NEPA analyzing direct, indirect, and cumulative impacts to all these areas. Substantive protections under NFMA for streams, including sedimentation, impacts to fish habitat, etc., would need to be analyzed. This hard look is not evident in the EIS. (138-5)	(138-6) Refer to Alternative 5.
The HNF must not only use the exception for big game retrieval and motorized camping sparingly, which would mean not applying it to every open motorized route	(138-7) Thank you for your comment.

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on the forest, but must also show how the impacts from motorized big game retrieval and motorized dispersed camping areas, where permitted, are being minimized in its decision. We look forward to seeing this issue addressed in the final decision. (138-6) IV. No Action / Baseline NEPA was enacted to ensure that information on the environmental impacts of any Federal action is available to the public before decisions are made and before actions are taken. Projected impacts of alternatives are compared in the EIS to those impacts projected in the no action alternative. How the no action alternative is defined, therefore, determines the intensity of environmental impacts in each alternative. The Divide's DEIS glosses over the true environmental impacts from each alternative because the no action alternative was not designed appropriately. We reiterate our concern from our previously submitted scoping comments that any environmental analysis would incorporate the 11.6 miles of non-system roads and trails into the baseline for comparison of alternatives, and thus fail to create a comparison with the current designated system of roads and trails. If the existing system is the baseline then there would be no point of comparison; you would just be evaluating different action alternatives without using the designated system as a point of reference. In this case all the identified non-system routes would be treated as if they had already been authorized through previous analysis, but that is clearly not the case since the 2001 Tri-State ROD directed land managers to conduct site-specific analysis for all existing non- system routes before they could be designated for off-road vehicle (ORV) use. That detailed analysis of the impacts from the nonsystem routes and continued motorized use of those routes has not been completed in this DEIS. (138-7) Our request that the HNF redefine the no action alternative is not without purpose. It is important that the public understand the projected environmental impacts from	(138-8) Thank you for your comment.

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making changes to the transportation system, particularly the addition of new motorized trails to the system that is maintained and legally accessible to the public. Using only the currently designated system as the baseline condition will ensure that the HNF accurately discloses impacts as it proposes changes to the designated system. Additionally, if you demonstrate that you are carefully evaluating those routes in the action alternatives, it will be easier to explain why specific ones were not included in the final designated system. (138-8) Forest Service direction supports our position of what constitutes the baseline open, designated system: 11.1 – Baseline System Consolidate existing direction on travel management for the area under consideration into a single location. This step should not create new direction. Rather, this step involves compiling past decisions that guide motor vehicle use, including maps, travel atlases, road and trail management objectives (FSM 7714), maintenance records, and monitoring reports for National Forest System (NFS) roads and NFS trails on the administrative unit or ranger district. FSH 7709.55, Ch. 10. [Emphasis added.] The Forest Service Handbook clearly shows that only system roads and trails are appropriate for the baseline system, and therefore it is this direction that should also define the no action alternative and the situation to which all alternatives should be compared. The HNF's official motorized transportation system is comprised of designated roads and trails. The designated transportation system does not include non-system, unauthorized routes. The Forest Service's 2001 Tri-state Off-Highway Vehicle EIS and Forest Plan Amendment Decision (Tri-state decision) did "not change current road or trails designations" on the HNF. Tri-state FEIS at 1. Rather, the purpose of the Tri-state decision was to simply "restrict motorized wheeled cross-country travel." Tri-state FEIS at 1. The Divide TMP process is proposing to make changes	(138-9) Thank you for your comment.

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to the designated system of roads and trails. The HNF must comply with NEPA and take a “hard look” at the environmental impacts from these proposed changes to the designated transportation system, especially where non-system routes are being added to the transportation system. (138-9) V. Range of Alternatives a. DEIS Action Alternatives unreasonably narrow, with few real distinctions NEPA requires a “hard look” at “all reasonable alternatives,”6which in this case would include one or more alternatives emphasizing different conditions under which motorized access for dispersed camping would be allowed. The Forest Service Handbook guides managers to: Develop other alternatives fully and impartially...[and] ensure that the range of alternatives does not prematurely foreclose options that might protect, restore, and enhance the environment.7 NEPA further “mandates that agencies ‘study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources.” Pit River Tribe v. U.S. Forest Service, 469 F. 3d 768, 785 (9th Cir. 2006) (quoting 42 U.S.C. § 4332(2)(E)); see also 42 U.S.C. § 4332(2)(C)(iii) (agency must consider “alternatives to the proposed action”). Given the proposed dispersed camping provisions of Alternatives 2 and 3 would result in potentially unresolved impacts (i.e., conflicts) associated with the protection of as- yet undiscovered heritage resources, the HNF failed to give meaningful consideration to alternatives as they relate to unmitigated impacts to forest soils, vegetation and heritage resources resulting from the motorized cross-country allowance for dispersed camping. (138-10)	(138-10) Heritage The Helena National Forest currently manages 945 known cultural resources, of those, 238 cultural resources represents quarries, mines, homesteads, etc. The Helena National Forest also has 14 Historic Mining District that cover large landscape which include multiply associated features, such as building ruins, adits, shafts, ditches, roads, and trash piles. Of those 945 cultural resources, 7 sites are listing in the National Register of Historic Places (3 of them are on the Helena Ranger District), 839 sites have not received eligibility determination, therefor they are treated as Eligible. Forty-eight sites have been determined Eligible for listing, but have not been formally listed and 51 sites have been determine Not Eligible for listing in the National Register. A total of 181 cultural resources are identified within or adjacent to roads and trails in the Divide Travel Plan area. These cultural resources were discovered and documented as a result of prior cultural resource reconnaissance and project inventory in the travel plan area. On-the-ground inventory of each road and trail affected by the proposed Divide Travel Plan has not been undertaken because the Forest Service is considering only whether a road or trail will remain open or closed in this land use decision. Specific road closure methods, and their effects, will be

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The alternatives analysis guarantees that "agency decision makers '[have] before [them] and take [ ] into proper account all possible approaches to a particular project (including total abandonment of the project) which would alter the environmental impact and the cost-benefit balance.'" Bob Marshall Alliance v. Hodel, 852 F. 2d 1223, 1228 (9th Cir. 1988) (citations omitted). The Forest Service Region1 guidance for travel planning encourages units to analyze an action alternative that does not provide for a broad application of motorized dispersed camping corridors: Supervisors will follow national direction and apply this provision sparingly and on a route by route basis. You are also encouraged to consider alternatives to this provision such as individual route designation. Forest Service Region 1 Travel Management Planning Guidance. [Emphasis added.] Per its requirements under NEPA and Regional Guidance, the HNF should have offered more than one alternative in the DEIS to accommodate off road vehicle use on the forest. (138-11) 6 40 C.F.R. § 1502.14 (a) 7 FSH 1909.15 §14.2 Alternatives 3 and 4 clearly disfavor existing users of the trail system, instead favoring motorized use. To provide for a better range of options for the travel management plan, the HNF must analyze an alternative which provides both for closures and limited expansion of motorized use, which could possibly be achieved by modifying an existing alternative to address concerns expressed by non-motorized recreationists. (138-12) b. Forest Service Failed to Adequately Consider an Alternative Favored by the Public	the subject of separate environmental analyses. NHPA Section 106 compliance (including historical research) survey will be completed then, as necessary, for roads and trails proposed for obliteration. The proposed motorized route closures would be beneficial to cultural resources by preventing easy vehicle access to sensitive cultural resources which helps to abate vandalism and artifact theft. For example, historic mining buildings accessible by motorized routes located in the planning area have been dismantled to obtain antique wood for various decorative uses such as in home remodeling and picture frames. Mining equipment, such as ore carts and old equipment parts, have found new homes as lawn and landscaping ornaments. Prehistoric and historic properties are a non-renewable resource. They represent a resource base that cannot be replenished. For this reason several federal laws and regulations have been established that require federal agencies to identify, monitor, protect, and preserve cultural resources under their jurisdictions. Through the final NHPA Section 106 process, all undertakings would be identified and addressed, and any necessary mitigation measures incorporated into the project design or other appropriate heritage resources agreement. The goal is to avoid, minimize, or mitigate impacts to significant cultural properties. Since the late 1970s, cultural resource inventories have preceded all ground-disturbing Forest Service projects on the Helena National Forest, including vegetation treatments, livestock grazing, restoration, and recreation development. The majority of the cultural resources described in this travel plan analysis were discovered as a result of these compliance inventories. In fact, many archaeological sites were found because they were exposed

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The HNF failed to adequately take into account public comments made during the scoping period. Public comments supported further closing of trails and roads to off highway vehicles in order to protect wildlife security issues and general resource concerns. After the scoping period, the HNF created alternatives 3 and 4 in response to these comments, and then failed to adequately consider these alternatives when proposing an alternative for implementation. (138-13) Alternative 3 would implement further closures in the Kading-Limburger Springs Area. During the summer months, three existing routes would be closed, but open to over-snow travel during the winter months and one route would be shortened. In the Sweeny Creek Area, the existing unauthorized routes would be closed to motorized travel all year round, with exception of Priest Pass Road. In this alternative, almost nine miles of identified unauthorized routes would be added to the Forest Transport System. Additionally, there would be no consideration given for motorized access during the big game rifle season. While this is an improvement, and, with changes, could be a viable option, we cannot fully support this alternative as written. (138-14) VI. Comments on Specific Alternatives a. Sweeney Creek Primitive Area – Special Case The 7,800-acre Sweeney Creek Primitive Area is proposed as a “quiet trails and wildlife area” in the Montana High Divide Trails agreement,8 and the area is unique national forest tract, connecting high-quality wildlife winter ranges in the Helena Valley to the Continental Divide near Priest Pass. Proximity to town and law enforcement allowed off-road vehicle traffic to alter the once-quiet nature of Sweeney Creek. The proposed action would legalize a dense maze of approximately 10 miles of unlawful off-road vehicle tracks during the summer months for vehicles smaller than 50”.During the winter months, the proposed action would close the area to over-snow travel, which we support. (138-15) The HNF needs to correct its current condition map in order to distinguish between	in old road and trail beds. In most cases, project boundaries and treatments would be reconfigured to avoid impacting significant cultural resources so they could be preserved and the effect of these actions on cultural resources would be relatively minor. All forest actions require NHPA compliance and consultation therefore the effects on cultural resources would be mitigated through project redesign and/or avoidance. Roads and trails have been constructed through archaeological and historic sites over a period of many years. Regardless of alternative, road use has the potential to degrade cultural resources, particularly prehistoric archaeological sites. Any federal actions that poses an adverse effect to cultural resources (for example EPA cleanup) is required to consult with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Office (SHPO) and the Tribal Historic Preservation Office (THPO) to mitigate those effects (36 CFR 800). A few examples of mitigations are public interpretation, data recovery, or site relocation. The Helena National Forest has in the past and will continue to manage the Montana legacy for future generation through scientific investigations, preservation, restoration, rehabilitation, adaptive reuse (historic rental cabins), public interpretation and overall cultural resource management. The 1939 Helena National Forest Visitor Map is the map we currently use to determine the baseline age of trails and roads across the forest. The “existing and historic route” RS 2477 does not appear on the 1939, 1959 or 1969 Helena National Forest Visitor map; therefor we do not consider it a historic route or

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lawful roads and trails – part of the national forest transportation system – and scars established through illegal (prohibited -36 CFR261) acts—damaging plants, soils, and forest resources. (138-16) 8 The Lewis and Clark County Commission wrote Helena Forest Supervisor Kevin Riordan in June 2008 asking that he "fully consider the cooperative proposal of county equestrian, bicycle, hiking, conservation, trail and outdoor clubs known as Montana High Divide Trails" in upcoming travel plans. The majority of the roads are not currently legally defined on the forest transport system, and have never been proposed, analyzed or identified for public input in compliance with the National Environmental Policy Act. These routes, when designated for future motorized use, must be fully analyzed and efforts that have been taken to minimize the impacts from these routes must be fully disclosed. Failure to do so is a violation of law and policy. b. Winter Management i. Bison Creek-Josephine This is the existing quiet wild area on Bison Mountain, and in the final decision it should be extended east to include 5,000 acres of lynx and wolverine habitat in Bison Creek and along the Divide. ii. MacDonald Pass South The Continental Divide Trail corridor reaching from MacDonald Pass South to Jericho Mountain has traditionally been used for quiet snowshoeing and skiing and in the final decision should be maintained as such and not designated for motorized use during both winter and summer. (138-17) There is a Boy Scout snowshoe and winter camp here on the MacDonald Pass south side, as well. The Trail Corridor connects to Bear Gulch and Switchback Pass ski trails. All of it should be protected from winter motorized use. In order to keep this	cultural resource. A full NHPA Section 106 analysis is not needed at this time because the proposed Divide Travel Plan decision in an administrative planning effort that does not have the potential to cause effects to historic properties. The Advisory Council on Historic Preservations national policy on cultural resources and road and trail designations states… "the following categories of proposals shall be considered undertakings with the potential to affect historic properties, triggering evaluation under Section 106 of the NPHA, 36 CFR part 800 and the applicable programmatic agreements: construction of a new road or trail; authorization of motor vehicle use on a route currently closed to vehicles; and formal recognition of a user-developed (unauthorized) route as a designated route open to motor vehicles. Existing, formally established system (classified) roads and trails, already open to motor vehicle travel, generally need not be re-evaluated for purpose of this rule. Their designation on a motor vehicle use map will not generally be considered an undertaking for the purpose of NHPA and not subject to Section 106 review." FSM 2364.35 states one of the administrative measures to protect cultural resources from human-caused and environmental damage is "Closure to public and motor vehicle access". The closure of historic routes or routes that lead to sensitive cultural resources is considered a protection and preservation measure. Cultural resources (included historic routes) could be directly affected by permanent use and maintenance. Specifically, these routes provide access to cultural resources and thus invite vandalism, artifact collecting, arson, and other resource-

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area unpolluted and quiet, snowmobiles should not be allowed north of the already existing snowmobile trail system near Bullion Parks. Bison Mountain is inside the 15,000-acre core of the Electric Peak Recommended Wilderness. This area has traditionally been managed to provide solitude and wilderness values. Since 1997, it has been closed to motorized traffic year-round by a special order signed by then Helena National Forest Supervisor Tom Clifford. The order notes: "The initiation of this order is to prevent the loss of solitude or unacceptable depreciation of the wilderness qualities of the Electric Peak Roadless Area." VII. Forest Service Environmental Analysis is Insufficient a. The Forest Service did not properly analyze impacts on all forest resources due to inaccurate representation of the no action / baseline condition As we explained in Section IV regarding the no action alternative, in order for the HNF to demonstrate compliance with the minimization criteria and fully disclose impacts of adding non-system routes to the transportation system, the HNF should have used as the environmental reference point the currently designated transportation system. Only in this way can the public understand how specific routes contribute to the existing condition and how each route would change under the various alternatives. (138-18) b. Forest Service failed to fully analyze and minimize impacts on Grizzly Bear and Canada Lynx The DEIS fails to reveal site specific impacts to lynx and grizzly bears associated with maintaining existing motorized networks and opening 10 miles of motorized trails under Alternative 2. Despite concluding that lynx habitat connectivity would be maintained within and between Lynx Analysis Units (LAUs) due to net reductions in miles of open motorized routes during the winter, the DEIS fails to	deceptive behavior. For example, old access roads to the late 19th Century granite quarries in Sweeney Creek have been converted to a network of OHV trails. Because these trails now draw attention to the old quarry ruins, many have suffered various kinds of vandalism and abuse. - analysis (138-11) Refer to Alternative 5. (138-12) Refer to Alternative 5. (138-13) Refer to Alternative 5. (138-14) Thank you for your comment. (138-15) Refer to Alternative 5. (138-16)Thank you for your comment. (138-17) Thank you for your comment. The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. (138-18) Thank you for your comment. We are analyzing the effects of each alternative for the CDNST appropriately and following laws, policies, and procedures that are in place. The final decision will include future management direction that will also comply with laws, policies, manual direction, and procedures that apply. We carefully considered all options for motorized and non-motorized use along this trail to ensure consistency with the 2009 Comprehensive Plan, the National Trails System Act, and Forest Service direction.

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disclose the impacts of increased miles of motorized trails on lynx habitat connectivity. Calculating net reductions is not sufficient to assess local habitat connectivity in areas that support lynx. The DEIS makes no attempt to assess the degree of fragmentation. (138-19) With respect to grizzly bears, the DEIS fails to adequately address the recognized expansion of the distribution zone in 2013. As the bear population increases, there have been further accounts of bears outside of their traditional area on the upper reaches of the Little Blackfoot watershed, moving south. Because of the vagueness of the defined area of grizzly bear habitat, we raise serious concerns that efforts to minimize effects on this endangered species. Increasing roads endangers both the species and any humans who interact with them. (138-20) VIII. Conclusion We extend our appreciation to the Forest Service for the opportunity to provide these comments regarding the DEIS for the Divide TMP process. Your efforts to engage and educate the public in this process through meetings and phone conversations have been truly appreciated. Our intent in providing these comments is to work cooperatively with the Forest Service and the larger interested public to ensure that the HNF – as a public trust resource – is properly managed for the long-term public interest for the benefit of existing and future generations. To summarize our comments, we have serious concerns with Alternative 2 and its recommendation to add previously unauthorized trails to the forest travel map without NEPA analysis. Alternative 2 is not supportable. We appreciate the HNF's development of Alternative 3 – it's clear that you took our concerns into account as many of the concerns we raised in our scoping letter are reflected in this alternative. Alternative 3 proposes to decommission roads, prohibit motorized travel on previously unauthorized trials, protect and improve water quality, restore wildlife habitat, and enhance the ecological integrity of roadless areas. Although Alternative 3 is a much better proposal, we do not support it in its current form, although it is	(138-19) This analysis is provided in the Wildlife Background Report in sections on "Canada Lynx" (p. 192-204) and "Grizly Bear" (p. 184-192). Changes in connectivity and the size of non-motorized areas available to lynx and other species under different alternatives are discussed in the Wildlife Background Report (p. 91, 139-146, 192-193, 194-204). As discussed in the Background Report, lynx can have problems with highways (such as Highway 12 in the Divide landscape) but are little fazed by the low-use Forest roads characteristic of most of the Travel Plan Area. Nor do they have problems with snowmobile trails per se (as problems with snowmobile trails stem from access provided to competing carnivores). (138-20) The Wildife Background Report discusses the expanded Grizzly Bear Distribution Zone and its implications for bear management (p. 86-89, 184-187). All action alternatives reduce open rod density. (138-21) Thank you for your comment.

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still preferable over the current Alternative 2. (138-21) The Divide TMP effort offers an extraordinary opportunity for real restoration. We urge the HNF to make the suggested improvements to Alternative 3 and pick this alternative in the record of decision so that the Divide area is on a path to true restoration, ensuring effective protections are in place while also providing sufficient motorized access. We look forward to working with the Forest Service as the TMR implementation process moves forward. We are available to discuss our comments and concerns raised in the letter. Sincerely, Sarah A. Peters Program Attorney, WildEarth Guardians PO Box 50104 Eugene, OR 97405 541-345-0299 speters@wildearthguardians.org	
(139) From: Steve Platt <splatt4570@gmail.com> Sent: Thursday, June 12, 2014 5:30 PM To: FS-comments-northern-helena Cc: Degeest, Heather R -FS Subject: Divide Travel Plan Attachments: PlattDividecomment.docx June 11, 2014 Ranger Heather DeGeest Jamie Tompkins Helena National Forest Attention: Blackfoot Travel Plan	

Comments	Response to Comments
2880 Skyway Drive Helena, MT 59602 Subject: Divide Travel Plan Dear Heather and Jamie, My family and I hike, hunt, fish, and pick berries and mushrooms on the Helena National Forest (HNF) lands of the Helena Ranger District. Sometimes we cut some firewood too. We value quiet foot and horse trails and wildlife, above all else. Our family generally supports Alternative #3. The state of travel management on the Helena Ranger District (HRD) has been sadly deteriorating for years. Figure 1. Vandalized Road Closure sign on USFS Road #335. Unfortunately, the HRD has put off the Divide Travel Plan for well over a decade… a decade in which motorized use of areas like Sweeny Creek and Priest Pass, has exploded. The vast majority of this increasing motorized use is in the form of	

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illegal, user-created routes that damage soil and water quality, spread weeds, and compromise wildlife security. As an avid conservationist, hiker and hunter, this exploding network of illegal roads and trails on the HRD sickens me. This is country I have hiked and hunted in since the early 1990s. Lack of effective travel management is written all over this area in the form of undeniable resource damage.	
Please close and rehabilitate the maze of illegal tracks and trails north of the USFS boundary cattle guard in Sweeny Creek. Also please close the illegal roads in Sections 20, 21, and 28, Township 10 North, Range 5 West, identified as "divide non-system roads" identified by your HNF Watershed Team. (139-1) Figure 2. An Illegal road west of the Priest Pass Road in the Sweeny Creek drainage, Section 28, T. 10 N., R. 5 West.	(139-1) Refer to Alternative 5.

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 Figure 3. Illegal road and ford across Sweeny Creek in Section 28, T. 10 N., R. 5 West. The HRD placed a jack leg fence across this track after this damage occurred, but as of two years ago, insisted that this was indeed a ROAD and therefore could not be permanently closed without NEPA analysis. Yet no analysis has been done on many miles of user created routes that the HRD has put forward to legitimize via the travel planning process. PLEASE DO NOT LEGITIMIZE illegal motorized use on the HRD. (139-2) Much of the HRD has been hard-hit by the mountain pine beetle. The canopy is more open than it has been in many years, and big game security (hiding cover) is at a real low point. Combine these factors with unregulated motorized travel, and the ill-thought-out hazard tree removal project and there is no place for an elk to hide! The travel management situation is especially frustrating to me (and many other	(139-2) Thank you for your input.

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Helena area conservationists) because I have brought the illegal road/trail problems in Sweeny Creek/Priest Pass area to the attention of the HRD repeatedly over the last 15 years. Figure 4. Another illegal road in the Sweeny/Priest Pass area, in Section 20, T. 10 N., R. 5 West. This track crosses live water and parallels the Priest Pass Road for well over half a mile. Now, thanks to the hazard tree project, firewood is further from main roads than it used to be and people are pushing even further off of system routes to get it. The few photos I have included illustrate HNF travel management failures in a very small part of the HRD, but many other parts of the divide planning area have suffered the same problems in the last 20 years. Lastly the rugged, rocky (Boulder batholith) ground in Sections T. 10 N., R. 5 W. Sections 7, 8, 9, 10, 15, 16, 17, 18, 21, 22, and 23 is actually ROADLESS and has been that way since the beginning of time. I do not know why this area was never before formally recognized as roadless but today it is most definitely such. I request that this area be formally recognized as the Sweeny Roadless Area. The timber in	(139-3) Designating roadless is beyond the scope of the Divide Travel Plan.

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the area would be cost prohibitive to harvest due to the rugged nature of the terrain and this area is an important elk security cover in a part of the divide landscape that is severely lacking in security and hiding cover. (139-3) Sincerely, Steve Platt 528 West Lawrence Street Helena, MT 59601 406-449-8245 splatt4570@gmail.com	
(140) From: Rose, Sharon <shrose@mt.gov> Sent: Thursday, June 12, 2014 6:20 PM To: FS-comments-northern-helena-helena Cc: Degeest, Heather R -FS Subject: Divide Travel Plan--Comments Attachments: Divide TP--DEIS & BG Security Amend--Attach 1 (MFWP 2003).pdf; Divide TP--DEIS & BG Security Amend--Attach 2 (MFWP 2007).pdf; Divide TP--DEIS & BG Security Amend--Attach 3 (MFWP 2009a).pdf; Divide TP--DEIS & BG Security Amend--Attach 4 (MFWP 2009b).pdf; Divide TP--DEIS & BG Security Amendment.pdf Hello, Attached is Montana Fish, Wildlife & Parks' comment letter for the Divide Travel Plan DEIS and proposed Forest Plan Amendment (regarding the Big Game Security Standard). Also enclosed are 4 attachments, consisting of earlier MFWP comment letters regarding the Divide Travel Planning process. Thank you,	

Comments	Response to Comments
Sharon Sharon Rose Comments Coordinator, Region 2 Montana Fish, Wildlife & Parks 3201 Spurgin Rd., Missoula, MT 59804 406-542-5540 Fax 406-542-5529 shrose@mt.gov (NOTE TO IDT: All attachments are located at: O:\NFS\Helena\Project\TravelPlan\Divide\Documents\ProjectRecord\g_DEISandComments\DEIScomments - (140612_Rose_MTFWP). Montana Fish, Wildlife & Parks Region 2 Office Region 3 Office 3201 Spurgin Road 1400 South 19the Ave Missoula, MT 59804-3101 Bozeman, MT 59718-5496 406-542-5500 406-994-4042 Fax 406-542-5529 Fax 406-994-4090 June 12, 2014	

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William Avey Forest Supervisor Helena National Forest 2880 Skyway Drive Helena, MT 59602 Reference: Divide Travel Plan (Helena Ranger District area), Helena National Forest--Draft EIS and Proposed Programmatic Plan Amendment to the Helena NF Forest Plan (regarding Big Game Security, Standard 4a) Dear Mr. Avey: Montana Fish, Wildlife & Parks (MFWP) has reviewed the Draft Environmental Impact Statement (DEIS) for the proposed Divide Travel Plan, along with the proposed Programmatic Amendment to the Helena National Forest's Forest Plan regarding big game security (Standard 4a). Attached, please find our comments, which address those portions of the Divide Travel Plan area west of the continental divide, which is within MFWP's Region 2, as well as those portions east of the divide in Region 3 MFWP. (See "MFWP Personnel" at the end of our letter for specific MFWP contacts, in addition to us.) MFWP appreciates this opportunity to comment on the developing travel plan for the Helena Ranger District. We look forward to continued collaborative work as this proposal progresses. Sincerely, Randy Arnold Pat Flowers Region 2 Supervisor Region 3 Supervisor PF, RA/sr	

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C: Heather DeGeest, District Ranger, Helena Ranger District Separate Attachments (see "Reference" section for descriptions): 1. MFWP 2003 2. MFWP 2007 3. MFWP 2009a (Editorial Note: Table of Contents and Separate Attachments are Omitted. Full documents are available in the project record.) MONTANA FISH, WILDLIFE & PARKS COMMENTS ON THE HELENA NATIONAL FOREST DIVIDE TRAVEL PLAN DEIS Montana Fish, Wildlife & Parks (MFWP1) submitted detailed comments on the Helena National Forest (HNF) travel planning effort for the Helena Ranger District's (HRD) Divide Travel Plan area in 2009, during the "Proposed Action" phase of the Travel Plan (TP) revision (MFWP 2009a, 2009b). Earlier, in 2003, MFWP submitted comments during the HNF's start at revising its individual Travel Plans (MFWP 2003). At one time, a portion of the Divide TP was being reviewed in conjunction with the Blackfoot TP, under the title "Blackfoot-North Divide" TP, and MFWP submitted comments at that time (MFWP 2007). Many of those comments remain relevant today; hence we have enclosed copies of each. INTRODUCTION/GENERAL MFWP recognizes that the Helena Ranger District is a highly fragmented landscape (roughly 70-80% roaded), with numerous private land inholdings, numerous roads and an urban population center situated in the middle of its eastern slope. Pressure to develop inholdings, to increase recreational opportunities (both motorized and non-motorized), and to manage the wildland-urban/suburban interface and exurban areas is expected to continue, and to increase. Recreational use will also continue to	

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increase. The extensive amount of tree mortality due to mountain pine beetle infestations will change the character of the forest with attendant impacts to wildlife, district wide, for many years to come. All together, these factors present management challenges for the Helena RD as a land manager and for MFWP as manager of Montana's fish and wildlife populations. MFWP greatly appreciates the HRD's efforts to include our biologists in discussions on how to best improve wildlife habitat through both the travel plan and the big game security Forest Plan amendment. We look forward to continuing this work. Our comment below is organized by topic, with a discussion section and specific recommendations listed numerically under each topic. Some of our recommendations are iterative between topics because they apply to more than one area or wildlife issue. While MFWP has significant comment related to the DEIS, and in particular habitat management for big game and grizzly bears, the extent and thoroughness of the proposal necessitates focus. In light of this we offer a number of central principles that drive our comments and specifically apply to proposed travel management in the Divide landscape. It is our hope that the Helena National Forest will consider these under all alternatives. Roads and their effects are one of the most significant drivers of ecosystem health; minimizing their footprint on the landscape is necessary to retain high quality and functional habitats (Foreman et al. 2003). Roads can fragment habitats and adversely impact landscape connectivity (Lindenmayer and Fischer 2006). We generally suggest that overall road densities (open and closed) be minimized and that route density is ultimately lower than currently proposed under any of the alternatives. In principle we recommend minimizing habitat fragmentation by retaining and consolidating secure habitat blocks, clustering existing road networks, closing spur roads, arresting the expansion of user-created routes, and protecting critical habitats like meadows, riparian areas, and grassland parks. To be most effective, changes to travel management should minimize complexity and be	(140-1) Refer to Alternative 5.

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consistently enforced. (140-1) _____ 1 The Divide Travel Plan DEIS variously refers to Montana Fish, Wildlife & Parks as FWP, MDFWP and MFWP. We usually use the abbreviation FWP, but are using MFWP in our letter for consistency with use in the Reference section of the DEIS.(140-2)	(140-2) Thank you for your comment.
REDUCE HABITAT FRAGMENTATION, INCREASE CONNECTIVITY AND HABITAT SECURITY Under Alternatives 3 and 4, the DEIS proposes to reduce routes open year round to highway legal vehicles by 24 and 21 miles, respectively (total motorized route reduction of 71 and 57 miles, including unauthorized roads and trails). While this reduction would marginally improve habitat for wildlife in a few areas, the impacts of the motorized footprint would remain largely unchanged throughout the Divide planning area. The Nevada Mountain Inventoried Roadless Area (IRA) south to the Sweeny Creek Area and from Black Mountain IRA south to the boundary with the Beaverhead-Deerlodge National Forest (BDNF) as well as the Electric Peak Inventoried Roadless area are of particular interest. These portions of the HRD are highly fragmented, with limited functional secure habitat and connectivity. In order to improve the effectiveness of proposed closures, MFWP agrees that to the extent practicable, while still serving resource needs, that “the complexity of the Forest visitor use maps would be emphasized by reducing the number of different travel restriction types including seasonal restrictions; this would assist in making travel management simple and concise (i.e. current plans have 12-15 different closures)” (DEIS Summary pg 5, 4th bullet under Sideboards Used to Develop the Proposed Action). In contrast to the DEIS existing direction (Summary pg 1, para	(140-3) Thank you for your input, Divide Travel analysis is simply an open or closed decision, Closure recipes will be analyzed separately in the implementation of the decision

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5), MFWP recommends: (140-3) Specified decommissioning of roads should be part of the decision space for the Divide Travel Plan. (140-3) All travel restrictions should be clearly signed. Where necessary, closed roads should be gated and/or otherwise blocked to deter illegal trespass. (140-3) All closures should be consistently enforced. Focal Areas In addition to the closures proposed in the DEIS, MFWP recommends that additional year-round closures be enacted in certain focal areas. That is, where it is possible to close enough routes within a given area such that functional secure wildlife-habitat blocks could be established and/or expanded, more closures should be implemented. (140-4) As FS and MFWP biologists have already discussed, areas such as the southern portion of the Jericho Mountain IRA (and potentially from there south along the Divide) have inherently greater wildlife habitat values and could provide additional habitat connectivity along the continental divide (CD) as well as habitat for resident wildlife, including big game security during fall hunting seasons (9/1-12/1). MFWP supports closure of route 527-B1 as proposed under Alternatives 2-4 and recommends closure of 1863 north from its juncture with the Minnehaha Creek Road (route 527), and closure of 1863-E1. MFWP recommends year-round closure to motorized use of these routes. (140-5) The Greenhorn Mountain area and the 10-Mile Creek-Prickly Pear Creek divide should also be considered for additional route closures. At Greenhorn Mountain,	(140-4) This has been the focus of some of the route closures proposed under different alternatives. Site-specific examples are provided in the wildlife Background Report, “Local Effects in Key Areas” (p. 242-282). (140-5) Route 527-B1 would be closed yearlong in Alternative 2-5. Road 1863 south of Bulllion Parks runs directly atop the Divide—a route traditionally used as a travelway by numerous wide-ranging wildlife species. However, it’s use as an access route for several purposes (including private property) has made it a difficult route to close—and it would remain open under all alternatives. Field surveys (2013) indicate that the road is still being used as a travel route by elk, deer, coyotes, mountain lions, and probably others. Road 1863-E1 would be closed in Alternative 5. (140-6) Alternative 5, route 622 and part of 1853 would remain open year-round. All of the others would be closed. Alternative

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closure of routes 622, 1850, 1851, 1853, 1853-B3, 1853-B4, 1853-C1, and 1853-D1 would bridge two blocks of habitat into an area ≥1000 acres. (140-6)	5 would close routes 1876-A1, -C1, and –E1 would be closed. The others would remain open.
The Quartz Creek area is the most fragmented area on the HRD. At the 10-Mile Creek-Prickly Pear Creek divide, we recommend closure of 1876 and its sub-routes (-A1, -B1, -B3, and -E1), which do not connect to routes on the BDNF adjoining the HRD at this divide. This would add or expand an unfragmented block of habitat within the Quartz Creek area. MFWP does not support the opening of sub-routes 1876-C1 and 1876-D1 as proposed under all the action Alternatives. (140-7)	(140-7) Thank you for your comment. Refer to Alternative 5 for sub route closures.
On the 2006 HNF Travel Plan Map, route 1876 appears to be a light-duty gravel road, and route 218 (just to the west of 1876) is depicted as an unimproved dirt road. On the maps provided with the DEIS, route 218 is listed as a state or county road. Which of these designations are correct? (140-8)	(140-8)218 is a county road.
Within the Spotted Dog/Little Blackfoot Elk Herd Units (EHU), MFWP suggests closing the following roads and trails to highway-legal and wheeled vehicles, yearlong. In the Monarch Creek area 4104-A1 and 4104-A2 are currently only open to over-snow motorized vehicles, and 1801, 1801-A1, 1801-A2, and 1801-A3 are closed yearlong to all motorized use. Under all the action alternatives, the 1801 road system would be open to snowmobile traffic, and in Alternatives 2 and 4, 4104-A1 and 4104-A2 would be opened to vehicles with 50-inch-or-less width from 5/16 to 10/14. Opening the road networks, to either winter or summer travel in this area bounded by the continental divide and Electric Peak roadless area would compromise existing security for elk, grizzly bear, forest carnivores, and other species. We advocate a winter area closure south of 4104-A1 and 4104-A2 to the CD. This closure would, block up two portions of the Electric Peak IRA. (140-9)	(140-9) Thank you for your comment. The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities.
Under Alternative 2, roads 314-A1 and 314-E1 just south of Elliston--which are currently closed yearlong to all motorized travel--would be opened to highway-legal vehicles year-round, creating a parallel travel route to 314 itself. For these roads, we support Alternatives 1, 3, and 4, which retain the existing condition whereby	

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snowmobile access only is allowed on roads 314-A1 and 314-E1 (140-10)	(140-10) Thank you for your comment. The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities.
Closures of roads and trails west of Kading campground in the North Fork of Spotted Dog Creek and Limburger Spring would, depending on which Alternative is selected, expand a secure block of big game habitat adjoining Spotted Dog Wildlife Management Area (WMA) from 28,080 to 33,046 acres. This is the only HNF land south of Highway 12 that has "lesser travel restrictions," and it is an important linkage between elk summer range in the Little Blackfoot and winter range on the Spotted Dog WMA. Road 314 provides good access to this area--the three parallel travel routes across T8N, R7W, Sec 7 and 18 are unnecessary and compromise big game security. Yearlong closure of 314-J1 and 314-J3 would be appropriate. (140-11)	(140-11) Refer to Alternative 5.
Non-system trails MTR-501, -502, -503, and -504 are shown on the existing condition map (Alternative 1) as "trails open to vehicles 50" or less in width[,] 5/16-10/14," but Table E.2 (Appendix E, pp 20, 25) indicates they are category M-07, "trails open to vehicles 50" or less in width, no seasonal restrictions." Under Alternative 3 and 4, they would be closed to motorized vehicles yearlong. Closure of these 4 "MTR" routes--as well as 314 where it meets T8N, R7W, Sec 7, 314-J1, 314-L1, and 314-J3--would merge two existing big game security areas and create the largest big game security area in the Divide planning area (33,046 acres). Given the high hunting pressure and open landscape on the Spotted Dog WMA, these closures would improve habitat security in the Spotted Dog/Little Blackfoot area, where it is critically important. (140-12)	(140-12) The benefits of this security area expansion and its relation to the Spotted Dog WMA is discussed in the Wildlife Background Report (p. 64-66, 73-74, 173-174, 243-248).
MFWP urges the HNF to close routes in and adjacent to the Nevada Mountain IRA north and west of Meyers Hill to Nevada Mountain to over-snow motorized vehicles--in addition to permanently closing authorized and unauthorized routes there--in order to protect and expand one of the few remaining blocks of secure habitat in this portion of the Divide Travel Plan area. (140-13)	
In addition to focal areas, MFWP supports closure of more redundant routes and	(140-13) With the exception of Road 774-A1 along Deadman

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dead end spurs, wherever possible. (140-14) MFWP recommends that such closures be implemented year-round for public wheeled-motorized use to the maximum extent possible. If seasonal closures are considered, MFWP recommends closure from 9/1-5/15 to increase functional habitat during spring and fall and, in particular fall big game habitat security. (140-15) Wildlife Movement Corridor, Habitat Connectivity The entire Divide Travel Plan area is important as a wildlife movement corridor connecting the Northern Continental Divide Ecosystem (NCDE) and areas further south of Helena. (140-16) This connectivity is particularly important for grizzly bears and forest carnivores along the continental divide and through the Greenhorn Mountain/McDonald Pass and the Spotted Dog/Little Blackfoot areas. In the Divide Travel Plan area, there are four areas on the Helena Ranger District north of Highway 12 where forested habitat becomes constricted, but still provides direct wildlife connectivity between the northern and southern portions of the District. Because there are few land conservation measures on surrounding private lands near these constrictions, MFWP places particular emphasis on improving connectivity there. These four areas are the: Round Top Mountain/Dago Gulch/American Gulch area, Pauly Springs/Dog Creek/Mullan Pass area, Mullan Pass/Greenhorn Mountain/Priest Pass area, and McDonald Pass area. (140-17) MFWP encourages consideration of additional road closures and the decommissioning of illegal user-created trails in these areas in order to enhance wildlife connectivity to and through these especially important habitat blocks. Therefore, MFWP specifically recommends: Close, add restriction to, or decommission roads in the area between Meyers Hill	Creek , all routes in this area would be closed in Alternative 5. Benefits to wildlife of closures in the Black Mountain/Ophir Creek area are discussed in the Wildlife Background Report (p. 278-282). (140-14) Refer to Alternative 5. (140-15) Refer to Alternative 5. (140-16) The Helena NF rcognizes the importance of the Divide landscape as a linkage zone—as discussed in the Wildlife Background Report (p. 30-40, 138-146) and in equivalent sections of the FEIS. (140-17) Thank you for your input. Refer to alternative 5.

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and Roundtop Mountain. For example roads 1811, 1852-B1, 1852-A1, 1852, and trail 136-007 should be decommissioned. MFWP does not support designation of unauthorized route 136-007 as a motorized trail, as proposed under Alternatives 2 and 4. (140-18)	(140-18) In Alternative 5, all of these routes would be closed year-round except for 1811, which would become a seasona trail, closed during the hunting season (after 8/31).
Close, add restriction to, or decommission 1888-002 (an illegal road south of Dago Gulch in the headwaters of Dog Creek). (140-19)	(140-19) Alternative 5 would eliminate this route.
Close, add restrictions to, or decommission roads 4005-001, -002, -003, -005 and -006, and 571- 001 (all unauthorized routes) in the Clarks Canyon/Pauly Springs area in the headwaters of North Trout Creek. (140-20)	(140-20) All of these routes would be closed under Alternative 5. (140-21) Thank you for your comment, refer to Alternative 5.
Close, add restrictions or decommission as many roads as possible in the headwaters of Greenhorn Creek and Austin Creek--for example the roads and ATV trails around the Freemason Altar site should be closed. (140-21)	(140-22) Thank you for your comment.
MFWP supports the Helena Ranger District's proposal to restrict motorized use year round at MacDonald Pass under both Alternatives 3 and 4, closing route 1802 and designating the area as closed to snowmobile use. (140-22)	
The current and proposed motorized network on the Helena RD is more than adequate to provide access for big game hunting. In fact, the existing network severely fragments secure habitat blocks and this lack of fall big game security is likely limiting bull elk survival and retention of elk on the Helena RD. Thus, leaving routes 335-A1 and 335-A2 closed, as proposed under Alternative 3, would help to maintain connectivity and would expand a block of unfragmented secure habitat. (140-23)	(140-23) Refer to Alternative 5.
MFWP does not support the opening of routes 335-A1 and 335-A2 during the fall (9/1-12/1) hunting season. MFWP does not support opening any routes specifically to provide motorized access during the fall hunting season.	

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At MacDonald Pass, the change from Existing Condition recommended above would result in a contiguous block of >2000 acres of unfragmented secure habitat at a critical area along the crest of the CD.	
MFWP recommends closing routes in the vicinity of Mullan Pass, including routes 1805-A1, 1846, 1855-G1 (all of which are dead end spurs) as well as routes 1854, 1854-A1, 1855-A1, and 6222 (which are redundant to routes 1855 and 5713 both of which are primary access roads <1-3 miles apart). (140-24)	(140-24) Refer to Alternative 5.
Under all of the action Alternatives, some of the Continental Divide National Scenic Trail (CDNST) is proposed to change from open to motorized use to open to over-snow use, but the majority of the trail remains motorized during some portion of the year (winter, non-winter or both). MFWP recommends that the CDNST be designated non-motorized wherever possible to conserve the scenic qualities of the trail, as well as the integrity of the various wildlife habitat qualities it supports (movement corridor, denning areas, etc.). (140-25)	(140-25) Refer to Alternative 5.
MFWP supports management of the CDNST as non-motorized to the maximum extent possible and urges the HNF to consider closing additional reaches of the trail to all motorized use. (140-26)	(140-26) Refer to Alternative 5.
GRIZZLY BEARS	
Helena Ranger District habitat management of the species under the NCDE Grizzly Bear Conservation Strategies	
The DEIS sections that analyze effects to grizzly bears adequately address most grizzly habitat management issues subject to the proposals. However, the DEIS does not consider the Northern Continental Divide Ecosystem (NCDE) Draft Conservation Strategy (USFWS 2013; also referred to in our letter as Conservation Strategy or CS). (140-27)	(140-27) The Wildlife Background Report and FEIS have made

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For the last five years the Helena NF, other national forests and multiple agencies have been involved in a region-wide, multi-agency effort to delist grizzlies in the NCDE. A Draft CS agreement has been developed by an interagency team of managers and scientists in an effort to describe the coordinated 2 This route is labeled 622 on the maps provided with the DEIS, but on the 2006 HNF Map, it is labeled 655. 3 Routes 1855 and 571 intersect at both northern and southern points. management and monitoring efforts necessary to maintain a recovered grizzly bear population in the NCDE. This Conservation Strategy provides a cohesive umbrella for all signatories to operate under and reference but each signatory has their own legal process and authority to implement the Strategy. This Conservation Strategy would remain in effect beyond recovery, delisting, and the five year Monitoring period required by the Endangered Species Act (ESA). The agencies are committed to be responsive to the needs of the grizzly bear through adaptive management actions based on the results of detailed annual population and habitat monitoring (pg ii, para 1). The overall goal for habitat management under the CS on public Federal lands 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. When adopted, these standards would replace existing regulatory standards included in all agency management plans. The Draft CS document is under final review and targeted to be released during the fall of 2014, with the hope of starting the delisting process some time in 2015. The purposes of this Conservation Strategy are summarized in Appendix A of our	use of management recommendations in the NCDE strategy, but have not cited it because it is still in draft form.

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letter. MFWP recommends that the HNF include the CS (USFWS 2103) in the regulatory framework section and the policy sections of the Final EIS (FEIS) and that the HNF use the CS as a guiding document in the travel planning process. The CS and all its recommendations for the Zone 2 grizzly bear distribution area should also be incorporated into the FEIS's version of Appendix A (Forestwide Standards, Forest Plan Consistency and Management Area Direction). (140-28)	(140-28) All proposed Travel Plan alternatives are consistent with the recommendations.
A forest-wide food storage order is also necessary. (140-29)	(140-29) The food-storage order currently applies to the Lincoln Ranger District. The Helena District has been considering applying it to the Divide landscape—but it will not be done as part of the Divide Travel Plan. A decision will be made once the forest amendment to the Conservation Strategy is in place.
To adhere to the CS it is imperative that any Helena National Forest management actions affecting inventoried roadless areas falling within the NCDE Management Zone 2 (CS, Figure 1, pg 6) be consistent with the CS standards and be in place before the grizzly bear delisting process begins. (140-30)	(140-30) No new roads or motorized trails are proposed in inventoried roadless areas under any alternative.
Under the Conservation Strategies agreement, IRAs in Zone 2 are considered advantageous to and vital for grizzly bear conservation. Therefore, any changes to an IRA that allow for motorized access to these areas are not recommended. (140-31) Within the Divide Travel Plan area there are four Inventoried Roadless Areas, several smaller blocks of unroaded lands, and additional blocks of habitat that provide the opportunity for grizzly bears to safely move between the NCDE and adjacent ecosystems (e.g., the Greater Yellowstone Area; GYA). In these areas management should emphasize maintaining CS habitat standards, reducing motorized activity, and maintaining and enhancing wildlife security. Generally, inventoried roadless areas should be maintained or expanded.	(140-31) Thank you for your comment.
The currently closed road #4104-A1 in the Upper Ontario Creek-Bison Creek area should remain closed. (140-32)	
Grizzly bear habitat values outside of the Grizzly Bear Recovery Zone under the NCDE Conservation Strategies Agreement would be affected by the implementation	(140-32) Thank you for your comment. The Forest Service strives to strike a balance with respect to resource protection and

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of Forest Plan standards governing big-game security provision. It is imperative that the Divide Travel Plan adequately provide and protect secure fall big game habitat on the Helena Ranger District. Any reduction of fall big game habitat security or lifting of restrictions as a result of the big game security forest plan amendment for the Travel Plan, as it relates to the Helena Ranger District and Zone 2, is incompatible with the goal of maintaining or enhancing 2011 habitat conditions under the Draft NCDE Grizzly Bear Conservation Strategies Agreement for grizzly bears. MFWP suggests that the Helena NF work closely with MFWP biologists to accommodate grizzly bear habitat standards during amendment of the Forest Plan to address fall big game habitat security. If security needs for big game are ultimately met on the Divide Travel Plan area, grizzly bear habitat needs will also largely be met for this portion of the CS Zone 2. (140-33)	providing diverse recreation opportunities. (140-33) Thank you for your comment, refer to Alternative 5.
Focal Areas Under Alternatives 3 and 4 the DEIS proposes to reduce or eliminate certain routes open year-round to Highway Legal Vehicles, including unauthorized roads and trails. While these route closures would marginally improve habitat for wildlife in a few areas, the overall impacts of the motorized route system would remain largely unchanged in the Divide Travel Plan area under any action alternative. DEIS Appendix C (Additional Wildlife Information) states on page 15 about Alternative 3 (arguably the most beneficial to wildlife) that this alternative would add only 97 acres of functional habitat, “not enough to measurably augment local wildlife populations.” From Nevada Mountain IRA south to the Sweeny Creek Area, and from Black Mountain IRA south to the boundary with the BDNF, the HNF would remain severely fragmented with limited functional secure habitat and connectivity. In addition to the closures proposed in the DEIS, MFWP recommends that additional, year-round closures be implemented in and near the focal areas we identified above. Where route closures can create or expand functional secure wildlife habitat blocks more closures should be implemented. (140-34)	(140-34) Refer to Alternative 5.

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Any changes to the Forest Travel Plan on the Helena Ranger District that will enhance wildlife security will also be beneficial for grizzly dispersal and survival, especially in areas where route densities are high or where forested lands are constricted. Habitat Security & Closure Dates The DEIS proposes seasonal motorized closure dates on trails and roads throughout the plan area that allow travel through October 15th. Roads open during the fall hunting seasons (9/1-12/1) reduce big game and grizzly bear security. CS management criteria for grizzlies in Zone 2 are fundamentally tied to existing habitat recommendations and closure dates for maintaining big game security. MFWP has noted (MFWP 2009a; pg 6, Seasonal Restrictions, para 2) that motorized traffic/access in remote areas during fall hunting seasons significantly reduces big game security and that motorized-closure dates on trails and roads with restrictions should begin on September 1, not October 15. (140-35) This earlier closure date for motorized roads and trails in remote areas is especially important if the Helena Ranger District adopts the policy of allowing motorized use, game retrieval and dispersed camping within a 300-foot buffer along both sides of all motorized roads and trails. Consistent with the consensus of the Joint Working Group--a group of MFWP and FS biologists who prepared the "Collaborative Overview and Recommendations for Elk Habitat Management on the Custer, Gallatin, Helena, and Lewis and Clark National Forests" (MFWP and USDAFS 2013)--MFWP urges that seasonal closures extend from 9/1-5/15 in order to increase functional secure habitat during the fall. (140-36) Attractants/Food-Storage Order Securing potential attractants is the single most effective way to prevent black bears and grizzly bears from becoming food conditioned and developing subsequent	(140-35) Alternative B in the Forest Plan amendment has been developed in response to comments regarding closure dates. "Security is defined as a proportion of an elk herd unit within the administrative boundary of the Helena Ranger District that consists of an area of at least 1000 acres in size that is at least ½ mile from a motorized route open to the public between 9/1 and 12/1." See Forest Plan amendment, Alternative Description/Alternative B. (140-36) Alternative 5 proposes the 9/1 closure date for all but a couple routes.

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unacceptable behaviors. Containing attractants is effective in limiting human-caused grizzly bear mortalities, grizzly bear human encounters and other grizzly bear-human conflicts. The CS states that "the Helena National Forest and the BDNF are in the process of implementing a food storage order on all lands in Zone 1 and Zone 2." MFWP recommends that the Helena Ranger District implement a food-storage order and suggests it be addressed in the Divide Travel Plan. (140-37) We encourage the Helena Ranger District to implement food storage standards for all of the District's developed campgrounds, dispersed camp sites, trail heads, grazing allotments (carcass management), administrative sites, rental cabins and USFS cabin lease sites at the Moose Villa Tract along the Rimini Road, the Forest Heights Tract at McDonald Pass, the Prickly Pear Sportsman Association's target range at McDonald Pass, and the Lion's Sunshine Camp along the Little Blackfoot River. This will be especially important if the Helena Ranger District proceeds with plans allowing wheeled motorized access for camping within 300 feet on either side of designated system routes (roads and trails).	(140-37) Food closure orders are outside the scope of the Divide Travel Plan.
FOREST CARNIVORES Marten, fisher, lynx, and wolverine (which we collectively refer to as forest carnivores) utilize habitats with high structural complexity for both foraging and denning (Ruggerio et al. 1994). The persistence of these populations is tied to the availability of secure refugia in habitats that maintain a variety forest types and terrain. Denning habitat is likely a limiting factor for both fisher (Powell 1993) and wolverine (Copeland 1996). MFWP recommends minimizing road networks and over-snow travel in potential wolverine habitats (Copeland and Harris 1994). (140-38) MFWP supports additional area closures to over-snow use north and south of	(140-38) Winter tracking surveys have consistenly located wolverines in areas that cannot be defined specifically as "wolverine habitat", but simply as garden varietry winter habitat us d by a variety of wildlie species, including lynx, marten foxes, coyotes, weasels, snowshoe herees, and others. This is roaded

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MacDonald Pass and between Nevada Mountain and Meyers Hill. To protect potential denning habitat for wolverine, we advocate creation of loop trails rather than spur trails which deliver users to inventoried roadless areas or along the CD. 140-39)	habitat used by snowmobiles in winter. As far as we know, there is no snowmobile use in potential wolverine denning habitat in theDivide landscape (Wildlife Background Report, p. 102-104). (140-39) Refer to Alternative 5.
OFF-ROUTE TRAVEL Alternatives 2, 3 and 4 would allow OHV use within 300 feet of any motorized trail or road. MFWP believes this policy will be abused and will encourage off route travel, excessive road braiding and resource damage, especially in areas with open ridge lines and meadows. In addition to causing greater disturbance to wildlife, the policy will ultimately lead to more dispersed camping, more poor camping etiquette, and ultimately more attractant-related bear conflicts. If a 300-foot use-buffer is allowed on either side of a road or trail right-of-way, then the HNF should formally analyze expected impacts associated with a 600-foot corridor (~1/10-mile wide) along open motorized roads and trails (140-40) Impacts would vary, but the areas where impacts are most likely to occur--open meadows, grassland parks and riparian habitats--are some of the most vulnerable and are important areas for wildlife on the HNF. Edge affects--including microclimatic drying, introduction of invasive species, and increased nest predation-- will be greatly increased by such a broad human-use buffer (Hartley and Hunter 1998, Lindenmayer and Fischer 2006).	(140-40) Refer to Alternative 5.
MFWP supports allowing Forest users to park safely adjacent to roads and trails within 30 feet from the edges of motorized roads and trails, but is opposed to allowing dispersed camping or use of motorized vehicles for retrieving game and firewood gathering 300 feet on either side of road or trail systems throughout the HNF. (140-41)	(140-41) Refer to Alternative 5.
WINTER/OVER-SNOW TRAVEL	

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MFWP appreciates the clarification in the Summary (Public Comments and Agency Clarifications, pg 10, item 1; emphasis DEIS) that, "The routes the HNF are proposing to open are in areas that are currently open to over-snow motorized travel; however, the road prism in the open areas is currently closed which was an oversight when the original forest plan and maps were approved and produced. The original intent was for roads to be closed to wheeled motorized use, not over-snow motorized use." We understand the desire to allow winter use of roads for snowmobiling where off-road use of snowmobiles is also allowed. In past comment (MFWP 2009b; pg 6, General section, #2), we therefore supported managing motorized over-snow travel by designating areas closed to such travel, rather than designating specific winter road closures. Some provision to allow snowmobilers to pass through closed areas on main arterial routes may be acceptable in some cases. MFWP supports closing additional areas to over-snow use as proposed under Alternatives 3 and 4 (such as Nevada Mountain to Meyers Hill). MFWP supports the concept that roads designated closed to wheeled motorized use yearlong but open to motorized over-snow use under this Travel Plan Decision may still be considered for full decommissioning in a separate NEPA analysis and decision (Ch 3, pg 154, Alternatives 2, 3, 4, "Direct and Indirect Affects," para 2).	
MFWP recommends that identified big game winter ranges and the edges of winter ranges be closed to all motorized use, with the exception of main, arterial routes (with no off-route travel allowed). (140-42)	(140-42) Wildlife – design criteria
The HRD is especially important for lynx and wolverine movement. For example, there have been consistent reports of wolverine in the Marysville/Greenhorn Mountain, Mullan Pass, Nevada Mountain, and Jericho Mountain areas. (140-43)	(140-43)This use is documented in the Wildlife Background Report (p. 96-98, 102-104)
MFWP supports additional area restrictions to over-snow use north and south of	(140-44) Thank you for your comment. The Forest Service

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MacDonald Pass (specifically Sweeny Creek and the area on the crest of the Continental Divide to the north), the Nevada Mountain/Meyers Hill area, and an additional portion of the Jericho Mountain IRA. However, MFWP recommends that the entire Jericho Mountain IRA be closed to over-snow motorized vehicles. (140-44) MFWP recommends an area closure to over-snow travel south of 4104-A1 and A2 to the Continental Divide. (140-45) Roadless Areas As noted in our 2003 and 2009 comment letters, MFWP believes that Roadless Areas should be managed at their maximum acreage as roadless and that OHV and over-snow use should not occur in these areas. (140-46) These roadless areas serve as important wildlife refugia and have ever-increasing value to maintaining wildlife populations and enhancing fisheries. Within the Jericho Mountain IRA, MFWP supports closure of route 527-B1 as proposed under Alternatives 2-4) and supports the additional area restriction to over-snow use. However, MFWP recommends closure of route 1863 north from its juncture with the Minnehaha Creek Road (route 527), closure of 1863-E1, and expansion of the area restriction to include the entire Jericho Mountain IRA. MFWP strongly recommends closing the Nevada Mountain IRA, and all roads within it, to all motorized travel, including over-snow travel. This would be consistent with adjacent Lincoln Ranger District's travel planning and protect this high-value movement corridor and wildlife habitat (including grizzly denning habitat). For this Travel Plan area, these closures should include portions of Threemile Creek, Georgia Creek, Black Mountain, and roadless areas north of Meyers Hill.	strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. (140-45) Thank you for your comment. (140-46) Thank you for your comment.

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To increase compliance and enforcement expediency, we recommend extending the winter-use closure for the Nevada Mountain IRA slightly, so that road 136 (Ophir Creek to Roundtop Mountain) forms the closure area's southern boundary. (140-47)	(140-47) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities..
In order to retain its status as a roadless area and consideration as Wilderness, it is important that motorized recreationists not trespass in the Electric Peak IRA.	
MFWP strongly recommends (as proposed in Alternative 3) the elimination of all motorized access to Baldy Ridge and upper Spotted Dog Creek, as well as beyond Kading campground along the Little Blackfoot. This proposed action is noted on page 23 of the Summary under Design Features for the Kading-Limburger Springs Area (Alternative 3). As noted for the "Key Areas: Baldy Ridge-Spotted Dog Creek-Kading" wildlife component under Alternative 3 Effects (Appendix C, Additional Wildlife Information, pg 22; emphasis MFWP): "These routes would be converted to foot trails--in essence, creating an unofficial addition to the Electric Peak Roadless Area just to the southeast."	
MFWP recommends deployment of appropriate signage so that motorized users will not inadvertently cross into the Electric Peak area. To reiterate from our 2003 letter (pg 8): (140-48)	(140-48) Thank you for you input
Snowmobile Use Near Proposed Electric Peak Wilderness Area. Portions of the Deer Lodge Snowmobile club's groomed trail project lie adjacent to the Divide Travel Plan area. The proposed actions will probably have little or no effect on the groomed snowmobile trail system and its use by the public. However, sections of Snowmobile Trail #4, the Spring/Emery Road 1504 trail, a marked, groomed snowmobile trail and sections of Snowmobile Trail #3, the Cottonwood Lake Loop trail, and a marked, ungroomed trail lay adjacent (1-2 miles) to the proposed Electric Peak Wilderness area. In consideration of motorized-use wilderness trespass problems in other areas, we believe it would be prudent to consider signing the likely points of entry in the proposed wilderness. Those points of entry might include the intersections of Trails 65, 66, 140 and 147 and wilderness	(140-49) Signing will be considered during implementation.

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boundary. In addition, we suggest signage where all the above-mentioned trails leave the snowmobile trail system at specific points along each snowmobile trail (Trails #3 & #4). (140-49) Closure Dates North of Montana Highway 200, MFWP strongly recommended that snowmobile seasons end April 1st (with a single exception for the "Copper Bowls" area of the Lincoln RD). A standard April 1st closure date north and south of Highway 200, within the Lincoln and Helena RDs, would benefit to grizzly bear, wolverine (Copeland 1996), and other wildlife. April 1st is the date commonly accepted by land managers as the spring emergence date for grizzly bears in the Northern Continental Divide Ecosystem. There may be specific areas in the Divide Travel Plan area that may be appropriate for later spring closures but these should be evaluated on a case-by-case basis. (140-50) MFWP recommends that April 1st be the closure date for off-road snowmobile use across the Divide Travel Plan area in order to protect wildlife (including denning grizzly bear and wolverine, spring survival for ungulates, etc.) and reduce user confusion. (140-51) BIG GAME WINTER RANGE The Sweeny Creek area is important big game winter range. Designating this area as non-motorized year round will result in a substantial block of unfragmented habitat (4,185 acres; >2,500 acre increase from Existing Condition) for big game and other wildlife species. These 4,185 acres will provide the only block of secure habitat on public land east of the continental divide and north of Highway 12 within the project area, unless additional motorized route reductions are also implemented in the vicinity of Greenhorn Mountain.	(140-50) Currently, the only grizzly bear denning areas known or suspected to be situated in the Divide landscape are in the headwaters areas of the Little Blackfoot River and the Little Prickly Pear watershed. The upper Little Blackfoot is in the electric Peak Roadless Area and is entirely off-limits to snowmobiles. Most, but not all of the upper Little Prickly Pear drainage is also closed to snowmobiles. Additional restrictions may be applied as more specific information on grizzly deanning emerges. (140-51) There is no known wolverine denning habitat in the Divide landscape, and in those areas that appear to hold some potential as such, there are no snowmobile routes and no known off-route riding (see Wildlife Background Report, p. 205). (140-52) Alternative 5 closes all routes in the Sweeney Creek area with the exception of the Priest Pass Road.

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MFWP supports designating the Sweeny Creek area as closed to motorized use year-round, and notes that this is a Design Feature specific to Alternatives 3 (Summary, pg 23) and 4 (Summary, pg 26). (140-52) BIG GAME SECURITY MFWP generally supports the Forest Service's proposal to amend Standard 4(a) to instead use the "security area" concept ("Hillis Paradigm"; Hillis et al. 1991) as the basis for providing and monitoring effective big game security on the HRD. However, we disagree with how the framework was applied in the Proposed Forest Plan Amendment for Big Game Security (hereafter, the Amendment). We will explain why we disagree and offer alternatives. _____ 4 References as provided in comments from MFWP to the HNF Lincoln Ranger District (MFWP 2007) for its travel planning (relative to the Blackfoot-North Divide Winter Travel Plan proposal, 2nd scoping): The Habitat Conservation Plan for Grizzly Bear, developed by the Montana Department of Natural Resources and Conservation for Forested State Trust Land (MDNRC 2010, Vol 2 Ch 2), provides several provisions that rely on the April 1st date, including active den avoidance and post-denning mitigation (April 1--May 31). The Swan Valley Grizzly Bear Conservation Agreement (USFWS et al. 1995) relies on an April 1st--June 15th closure to avoid spring bear habitat where forestry activities are involved. The Helena National Forest Plan Amendment 13, May 1998, (USDAFS 2004:106-108) for oil and gas exploration calls for a Spring Habitat Timing Limitation with surface-disturbing activities precluded in MS2 from April 1st--June 30th. The Interagency Rocky Mountain Front Monitoring Evaluation Program (USBLM 1987), on the Lewis and Clark National Forest identifies April 1st as a critical spring emergence date. Hillis et al. (1991) and subsequent researchers (summarized in Christensen et al.	

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1993, Proffitt et al. 2013), clearly demonstrated that motorized route density, location, and timing of use are the most important factors affecting public-land bull elk survival. Hillis and his coauthors recommended retaining large, non-linear, strategically located, and well-distributed patches of non-motorized habitat during the fall hunting season to both protect bulls and prevent displacement of elk from public lands. The objective of a big game security standard should therefore be to ensure that adequate and well-distributed secure, big game habitat is retained within Travel Plan Elk Herd Units5, so that such provision will both protect a defined proportion of bulls from harvest and prevent the displacement of public elk from public lands during the fall hunting season. The correct measure of the standard's adequacy is not elk population counts or trends within MFWP Hunting Districts or FS Elk Herd Units, although these are referenced in the discussion of big game security in the DEIS and the Amendment. Across the HRD, big game habitat security is first and foremost a function of fall motorized-route density and location. However, forests on the HRD are more naturally open, hiding/screening cover is not ubiquitous, and tree regeneration is slower following disturbance, compared to either the Superior6 or the Lincoln Ranger District. Therefore, specific provisions quantifying and protecting "cover" may be a necessary component of a big game security standard for the HRD. A complete application of the Hillis Paradigm requires that managers specifically designate large and well-distributed security areas within Elk Herd Units. We think the current proposal selectively, and incorrectly, applies portions of the Hillis Paradigm as a basis for amending the Big Game Security Standard on the HRD. Minimum Security Area Patch Size The field research that led to the development of a minimum "security area" patch size recommendation (Hillis et al. 1991, Lyon and Canfield 1991) was conducted in	

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the Lower Clark Fork drainage of western Montana. That study area's topography, forest composition, and public-private land matrix were significantly different than those on the HRD. The authors explain that in the Lower Clark Fork, "conditions are favorable for elk to elude hunters: cover is dense, terrain is steep, and forest communities are largely unfragmented" (Hillis et al. 1991:39). Although the authors recommended that, on their study area, secure patches are a minimum of 250 acres in size and comprise at least 30% of a herd unit's fall home range (EHU), they were clear that where forests are more sparse and where terrain is less formidable (as in the HRD), the size of security areas must be significantly larger in order to provide similar security to resident elk. _____ 5 Hillis et al. 1991 stress that, "… to be biologically meaningful, analysis unit boundaries should be defined…specifically by the local herd home range during hunting season." The FS-FWP Joint Working Group Recommendations take the definition of an Elk Herd Unit from the literature: "Ideally, herd unit home ranges are defined by animals, typically on the basis of radio relocation data collected over enough time and for all seasons that the annual use patterns of elk form a pattern (Hillis al. 1991, Lyon and Christensen 1992)." Therefore, MFWP uses the term Elk Herd Unit to capture the area used by elk on a year round basis, regardless of ownership. MFWP uses the term Elk Analysis Unit to indicate that portion of an Elk Herd Unit within the FS administrative boundary. 6 The field research that led to the development of a minimum "security area" patch size recommendation (Hillis et al. 1991, Lyon and Canfield 1991) was conducted in the Lower Clark Fork drainage of western MT. That study area's topography, forest composition, and public-private land matrix were significantly different than those on the HRD. HRD forests are drier and have sparser understories than those in the Lower Clark Fork; there are more natural openings, the topography is generally less severe, and the District is highly fragmented due to the extensive network of motorized routes and private land inholdings. Nevertheless, in the DEIS the HNF proposes only the	(140-54) Refer to Divide Travel Plan Alternative 5 and Amendment Alternative B.

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minimum recommended security area patch size , 250 acres, and an even lower proportional retention of secure habitat, 30% of an Elk Herd Unit within the FS boundary, as the new standard for Big Game Security on the HRD. This proposed standard is not adequate and not supported by the literature. (140-54)	
In order for security areas on the HRD to adequately protect bull elk and reduce displacement of elk to private land refuges during hunting season, individual security areas need to be much larger than those proposed in the Amendment and the proportion of secure habitat must be increased. In addition, some consideration of cover is likely warranted, perhaps in the form of a limited amount of disturbance to cover or specific regeneration or restorative plans.7 (140-55)	(140-55) Refer to Alternative 5.
On the HRD, MFWP supports using a standard 0.5-mile buffer around roads, trails, and private land inholdings open to motorized travel during the fall season (9/1-12/1) as the basis for security area analysis. Because the effectiveness of a security area is necessarily a function of distance to its unsecure edge, patches with constrictions ≤0.5 mile in width should be separated at that constriction and analyzed individually. The USFS/MFWP Joint Working Group strongly recommended that 9/1, rather than 10/15, should be considered the beginning of the fall hunting season because the number of archery hunters, and their use of forest roads, has grown substantially in recent decades. (140-56)	(140-56) Thank you for your input.
Preliminary analysis of the application of these criteria to each proposed Divide Travel Plan Alternative indicates that implementing any of the action Alternatives will only marginally improve big game habitat security. Under all of the proposed alternatives, none of the EHUs contain enough large blocks of secure habitat to sufficiently provide functional big game security at minimum recommended levels, and this lack of fall security likely limiting both survival of bull elk and retention of elk on public lands during the fall hunting seasons.	(140-57) Thank you for your comment, refer to Alternative 5.
In addition, blocks of secure habitat are not well distributed, resulting in significant expanses of unsecure habitat. All six EHUs on the HRD would require more road	

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closures, in addition to those closures already proposed under the action Alternatives, in order to substantially improve big game security during fall and to move them toward any minimum recommendation. (140-57) In most EHUs, it will be challenging to increase the amount of functional secure habitat to minimum recommendations as proposed by the literature, the Joint Working Group, and FS and MFWP biologists, who are continuing to work together to develop a habitat security standard that would be appropriate and effective for the HRD.	(140-58) Thank you for your comment, refer to Alternative 5.
On the HRD, MFWP and FS biologists agree that, at minimum, a 1,000-acre patch size (closed to public motorized access 9/1 – 12/1) is likely necessary in order to function as secure habitat, and effectively retain elk on HNF lands despite increases in disturbance associated with hunting or other human activity (Lyon and Christensen 1992, Christensen et al. 1993, Stalling et al. 2002). This patch size represents a minimum effective patch size and this recommendation in no way justifies reducing patch sizes to meet this level (Hillis et al. 1991). (140-58)	
Intermittent Refuge Areas MFWP and FS biologists also recognize that smaller patches of non-motorized habitat may serve as "intermittent refuge" for elk and other big game in the HRD and recognize the importance of retaining these smaller patches because of the limited ability to add patches, or expand patches to ≥1,000 acres. While these smaller habitat patches are unlikely to provide effective big game security, in some EHUs these smaller patches are all that is available (be they truly functional security patches or not). (140-59) As such, these patches may play a role in big game security in an EHU and should be protected and enhanced wherever possible. Under all of the action Alternatives, preliminary analysis indicates that 3 of the 6 EHUs would have only one block of habitat meeting the security definition described above.	(140-59) Thank you for your input.

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7 Local MFWP and Helena NF FS biologists are engaged in discussion about this component. Security Area Design and Distribution The size of a security area is just one predictor of its effectiveness (Hillis et al. 1991, Christensen et al. 1993). Topography, open road locations, patch shape, and forest structure all help determine how large these areas need to be in order to provide similar benefits in different areas. The Hillis Paradigm is most effective when managers can manipulate the density, specific location, and seasonal use of motorized routes "so results make biological sense in a local setting" (Hillis et al. 1991)-- i.e., during Travel Plan development. At present, MFWP and FS biologists are working together on both the Divide Travel Plan and the Big Game Security Amendment. We hope that this collaboration will result in an effective big game security standard--one that effectively improves bull survival and increases retention of elk on public lands during fall hunting seasons. MFWP supports travel management that increases big game security on the HRD. To successfully implement this approach to elk security management, road closures must be effective and effectively enforced. When possible, permanent closures or decommissioning are preferable to relying on signage or gates. (140-60) Displacement of elk from National Forests can result in increased damage to crops and grazing pressure on rangelands, which can be costly to land-owners, decrease their tolerance for wildlife, and cost MFWP political and financial capital to mitigate. Hunter opportunity and MFWPs management capabilities generally decrease as elk are displaced from public to private lands. Large herds of inaccessible elk on private lands challenge the very concept of public ownership of wildlife. Security Area and Intermittent Refuge Area Retention Minimums	(140-60) Thank you for your input. (140-61) Thank you for your comment.

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In order to correctly apply the Hillis Paradigm the Forest Service would need to analyze, and ensure provision of, security areas across the full fall range of the District's EHUs. Hillis et al. (1991) stress that, "to be biologically meaningful, analysis unit boundaries should be defined . . . specifically by the local herd home range during hunting season" and should not be adjusted for land ownership. (140-61)We understand why this is not practical on the HRD and why the Forest Service proposes to limit its analysis of elk security to lands within the National Forest boundary.	(140-62) Forest Plan Amendment – analysis
The boundaries of several of the EHUs presented in the Big Game Security standard analysis in the DEIS are incorrect and do not include off-Forest elk herd-use areas (year-round, winter, or fall). The boundaries of the EHUs east of the Continental Divide were not generated with input from MFWP biologist(s) for at least the last two iterations mentioned in the DEIS, and the actual EHU boundaries are incorrectly truncated within private lands, arbitrarily 1.5 miles beyond the Forest boundary. Several of the Helena Ranger District's actual EHUs are under-represented.(140-62)	(140-63) Thank you for your comment.
All HRD EHUs include non-Forest Service (primarily private) lands; in some cases, the Forest Service manages only half of a herd unit's actual fall range. The Forest Service cannot restrict, nor effectively analyze, fall motorized-use of private land within (actual) HRD herd units. Therefore, these private lands must be considered unsecure for the purposes of any security standard compliance analysis. (140-63)The Hillis Paradigm recommends that a minimum of 30% of an Elk Herd Unit be comprised of security areas (Lyon and Canfield 1991). This may be an untenable standard given unequal distribution of private lands within and among HRD EHUs.	(140-64) Refer to Divide Travel Plan Alternative 5 and Amendment Alternative B.
Finally, because both the proportion of National Forest land and the functional security of private lands within herd units vary across the District's herd units, application of a single, uniform, security area retention standard for all herd units is impractical. The HRD should develop security area and intermittent refuge area	(140-65) Thank you for your comment.

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retention standards for each individual HRD EHU. MFWP recommends that those standards be tiered directly to the relative acreage of secure areas and refuge areas in each EHU, as developed collaboratively by FS and MFWP biologists8.(140-64) Because the Forest Service has no authority or ability to monitor fall motorized travel within significant (mostly private) portions of the HRD EHUs, a full application of the Hillis Paradigm is not possible. For an amended Helena Ranger District Big Game Security standard to both meet management objectives and allow consistent project-level analyses, it should only consider security areas within the National Forest boundary over which it has motorized travel management authority. (140-65)	(140-66) Refer to Amendment Alternative B.
Fall Hunting Season Dates Hillis et al. (1991) and others suggest that for habitat patches to be considered "secure" there should be no motorized routes open near or through them during the fall hunting season. The proposed amendment incorrectly identifies the fall hunting season as 10/15-12/1. Archery big game, fall black bear, fall mountain lion, mountain grouse, and other hunting seasons open in early September. Big game are vulnerable in and displaced from unsecure habitat during September and early October. All routes that are open to public motorized travel at any time between 9/1 and 12/1 should be considered when identifying security areas. MFWP agrees with the USFS and MFWP Collaborative Elk Habitat Working Group recommendation that low intensity and occasional administrative travel and management activity on fall closed routes should not change their status for the purposes of the security area analysis. (140-66)	(140-67) Thank you for your comment.
Big Game Security Standard Amendment, Specific Recommendations To be effective, security areas should be both large and thoughtfully distributed across EHUs. At the time of this comment, MFWP is actively working with Helena Forest staff to develop both a revised Divide Travel Plan Alternative and a Big	

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Game Security Standard Amendment. We are explicitly considering the habitat needs of a suite of fish and wildlife species, including big game, during this process. MFWP biologists consistently state that fall motorized-route density is unacceptably high throughout most of the HRD and that specific routes and motorized-use areas unacceptably compromise elk habitat security. MFWP supports the maintenance or establishment of some motorized trails in areas where such trails would have fewer impacts on fish and wildlife habitat, and are outside of focal areas important as wildlife habitat, habitat connectivity, and big game security. (140-67)	(140-68) Thank you for your comment.
While MFWP supports the designation of big game security areas as a means to both manage and measure functional big game security within established Helena Ranger District EHUs, we believe the approach was incorrectly applied in the original Amendment proposal. As an alternative, MFWP recommends the following: Any standard for Big Game Security should only consider those portions of EHUs within the National Forest boundary. (140-68) 8 An ongoing collaborative planning effort. All motorized routes and private land open to public travel between 9/1 and 12/1 should be included in the analysis. Security areas within the National Forest boundary should be defined as HNF lands >0.5 miles from roads, trails, and private land open to public motorized travel during the fall season (9/1- 12/1). Patches having constrictions ≤0.5 mile in width should be separated at that constriction and analyzed individually. Only patches meeting the above criteria that are larger than 1,000 acres should be considered “security areas” for the purposes a Big Game Security Amendment.	(140-69) Refer to Wildlife Specialist Report and Amendment for Big Game Security of the Divide Travel Plan.

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The proportional area of individual EHUs that meet the above security area criteria should be substantially increased from Existing Condition, as determined by FS and MFWP biologists, and should form the basis of an amendment to the HRD Big Game Security standard. Smaller blocks of unfragmented habitat ("intermittent refuge areas," 250-999 acres in size) within the NF boundary should be defined as HNF lands >0.5 miles from roads, trails and private lands open to public motorized travel during the fall season (9/1-12/1). Patches meeting the intermittent refuge area criteria above should be reviewed by FS and MFWP biologists to determine whether or not these patches are likely to provide intermittent refuge for big game species. MFWP recommends that patches that are determined to likely provide such intermittent refuge be incorporated in an amended big game security standard. MFWP and FS biologists continue to collaborate on how to best incorporate cover into any amended big game security standard.(140-69) Status of Elk Herds within the Divide Travel Plan Area MFWP no longer collects data tracking the percentage of bulls harvested during the first week of the rifle season; therefore, no recent data are available to assess habitat security using this metric. Instead, MFWP uses harvest data and post-season aerial classification surveys to monitor HRD elk herds. For all MFWP elk Hunting Districts (HDs) overlapping the HRD, MFWP's bull survival objective is to "Maintain bull:cow ratios observed during post-season aerial surveys above a minimum of 10 bulls:100 cows." In recent years, three of the four hunting districts overlapping the HRD fluctuated both above and below MFWP's minimum bull survival objective. Limited security habitat on the HRD may be affecting bull survival.	

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HD 215 During general rifle season, brow-tined bull elk may be taken with a general elk license in HD 215, and antlerless harvest is allowed with a B license. Surveyed elk populations in this HD have been well over the population objective of 1400 elk since 2009. The observed elk count went from 953 in 2006 to 1122 in 2007 when spring surveys were converted to winter surveys. Subsequently observed elk numbers have continued to increase significantly to 2234 in 2014. Some wintering elk use other HDs for portions of the year, but at this time we do not have data from marked elk to determine what proportion of wintering elk migrate outside the HRD. The predominant winter range in HD 215 is on MFWP's newly acquired Spotted Dog WMA, a portion of which is within the Little Blackfoot/Spotted Dog EHU. While overall numbers of elk are far above objective, bull numbers, in particular mature bulls, are low. In 2011, 87% of the observed bulls during late winter surveys were spikes. Bull:cow ratios were slightly above the objective of 10:100 (14:100 in 2012 and 12:100 in 2013), but the disproportionate numbers of spikes demonstrate that hunting pressure is significant in the area and security could be improved to increase survival of bulls. High numbers of antlerless elk licenses (500 B licenses in 2013) likely contributed to increased harvest of bulls because prior to the 2014 hunting season, hunters who had harvested an antlerless elk could remain in the field to hunt bulls. Substantial bull harvest in 2012 occurred on the newly acquired WMA. There is concern that a reduction of security on the WMA as well as increased hunting pressure on the HNF in the Little Blackfoot/Spotted Dog EHU is displacing elk onto private lands. MFWP will gather additional data and inputs from our publics, which could result in restricting bull harvest within the WMA in 2016. Our input regarding travel management on the HNF recognizes that MFWP and the HNF jointly manage habitat for elk in the Little Blackfoot/Spotted Dog EHU. HD 293 Annual aerial surveys are conducted in HD 293. Total observed elk numbers are significantly, and chronically, below MFWP objective in this hunting district. The 5-	

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year average bull:cow ratio (11:100 cows) is only slightly above the HD's minimum objective of 10:100 cows. Displacement of elk from public land to private land refuges is an increasing concern. HD 335 This hunting district is managed for general bull hunting opportunities; brow-tined bull harvest is legal with a general license. HD 335 remained above MFWP's population objective for the past three years, and during the preceding 24 years, observed numbers have fluctuated both above and below the objective. The bull:cow ratio has been at or below the minimum 10:100 objective for the past two years (11:100 and 9:100, respectively). Improvements to habitat security may also improve bull survival in this HD. HD 343 This hunting district is managed for general bull hunting opportunities; brow-tined bull harvest is legal with a general license. The observed number of elk was above the population objective once in the past 26 years, and remained at the midpoint of the objective for at least the past 4 years (2011-2014). Prior to 1999, the observed number was below population objective. This HD has been below the long-term average for calf:cow ratios in 8 out of the last 13 years. Over the same time period, the bull:cow ratio has been either right at or below the minimum objective of 10:100 for 6 of 13 years. Thus, the existing levels of big game security have not consistently yielded bull:cow ratios meeting MFWP's objective. Improvements to habitat security may also improve bull survival in this HD. EHU Specific Recommendations All six EHUs on the HRD require additional road closures to substantially improve big game security during fall and to move them toward any minimum recommendation. Quartz, Greenhorn, Little Prickly Pear-Ophir, and Jericho EAUs, in that order, are of highest concern. In most EHUs, it will be challenging to increase the amount of functional secure habitat to minimum recommendations as	

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proposed by the literature, the Joint Working Group, and FS and MFWP biologists, who are continuing to work together to develop a habitat security standard specific to the HRD. The potential to increase unroaded blocks of habitat appears to be the lowest in the Quartz Creek EHU9, because much of the unit is outside the project area. The Quartz Creek EHU has the lowest proportion of	(140-76) Thank you for your input.
9 The Quartz Creek EHU is the most limited in secure habitat--under any of the alternatives, there is only one block of secure habitat, and it is very near the minimum size: 1,333 acres. Most of this EHU is outside the Divide Travel secure habitat. At the EHU level, less than 2-3% of the area would be functional secure habitat under all of the Alternatives, including the Existing Condition/No Action Alternative.(140-76)	(140-77) Thank you for you comment.
At the 10-Mile Creek-Prickly Pear Creek divide, MFWP recommends closure of 1876 and its sub-routes (-A1, -B1, -B3, and -E1), which do not connect to routes on the BDNF adjoining the HRD at this divide, because this would add or expand an unfragmented block of habitat within the Quartz EHU. MFWP does not support the opening of sub-routes 1876-C1 and 1876-D1 as proposed under all of the action Alternatives. (140-77)	(140-78) Thank you for your comment. (140-79) Thank you for your comment.
Greenhorn Mountain may have slightly more potential than Quartz Creek, but it still falls far short of any minimum recommendation. Under the action Alternatives, the unit would only provide 4-11% (as a proportion of the entire EHU) functional secure habitat. (140-78) In the vicinity of Greenhorn Mountain, MFWP supports closure of routes 1853-E1, 1855-C3 and other nearby unlabeled routes (as proposed) and recommends additional closure of routes 622, 1850, 1851, 1853, 1853-B3, 1853-B4, 1853-C1,	

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1853-D1 and 1853-? (north of 1853-D1). Some of these routes do not appear on the 2006 HNF map, some lead to secondary roads on private lands that may or may not be accessible by the public, and all are dead end spurs with the exception of routes 1853 and maybe 1850. Closure of these routes would bridge two blocks of habitat into a secure block ≥1000 acres. (140-79)	(140-80) Thank you for your comment.
The potential to increase security blocks appears to be the greatest in the Little Blackfoot/Spotted Dog, Jericho, and Little Prickly Pear Creek/Ophir EHUs. Jericho Mountain and Little Prickly Pear/Ophir EHUs are also highly fragmented units under the Existing Condition, and at best under the action Alternatives would provide roughly 19% and 13%, respectively, functional secure habitat at the EHU level. Within the Jericho EHU, there is potential to expand security by managing the IRA to its fullest extent as non-motorized. MFWP supports management of route 527-B1 as closed, as proposed under Alternatives 2-4, and recommends closure of 1863 north from its juncture with the Minnehaha Creek Road (route 527), and closing route 1863-E1. (140-80) Functional big game security is highly limited within the Little Prickly Pear Creek/Ophir Creek EHUs--and would continue to be under any of the analyzed Alternatives. MFWP recommends implementing the proposed closures presented in Alternative 3 to begin moving these EHUs toward minimum security area standards. All unauthorized routes within these EHUs should be permanently closed, the CD trail should be managed as non-motorized wherever possible, and the Nevada Mountain IRA/Meyers Hill area should be closed to motorized use year long. (140-81) In the Spotted Dog/Little Blackfoot EHU, Alternatives 3 and 4 would consolidate security areas, and Alternative 3 would most improve big game security for this EHU. Under that Alternative, 3 large security blocks totaling 33,046 acres would exist, compared to the current configuration of 28,800 acres in 5 blocks (Summary,	(140-81) Thank you for your comment.

Comments	Response to Comments
Table 7, pg 36); we discuss this in greater depth in our "Focal Areas" section under "Reduce Habitat Fragmentation, Increase Connectivity and Habitat Security" at the beginning of this document.	
Plan project area, but it is entirely within the Helena Ranger District, and any Amendment to the big game security standard would apply to the entire Helena RD. The Black Mountain-Brooklyn Bridge EHU is also only partially within the project boundary. This area is directly adjacent to Helena (it is the back drop to the west and south of Helena). Major access routes through the unit, and increasing suburban/exurban development within it, constrain opportunities to increase big game habitat security. There is no change in security from Existing condition under any of the action Alternatives; at best, it will not meet a minimum security recommendation. Look for opportunities to increase security when that portion of the EHU outside the current project area is revisited for travel planning, and reevaluate the assumptions of any big game security standard implemented between now and then. In addition to focal areas, MFWP supports closure of additional redundant routes and dead-end spurs when possible; doing so would increase the size of or add functional security blocks.)140-82) MFWP recommends that seasonal closures begin 9/1 to increase functional habitat security during the fall. (140-83) FISHERIES CONSIDERATIONS We understand that the Divide Travel Plan dictates only the open-closed status of system roads, and does not determine whether or how any system roads will be decommissioned. Decommissioning roads, particularly those that cross or that are in	(140-82) Refer to Alternative 5. (140-83) Refer to Alternative 5. (140-84) Thank you for your comment. Closure methods will be determined during implementation.

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close proximity to streams, is one of few actions relative to the transportation network that would provide measureable benefits to fisheries and hydrologic resources in the planning area. (140-84) The benefits would be realized via the reduction in sediment delivery to streams, improved channel morphology, and/or increased habitat connectivity. Alternative 3 offers the greatest framework and potential to do future road decommissioning work that would most benefit the affected watersheds. It also does not increase the amount of "high risk" open roads that could harm fisheries.	
Features Common to All Action Alternatives (DEIS Chapter 2 Alternatives, pg 23)	
MFWP supports closing creek and river fords permanently or until upgraded crossings can be installed. Actions specifically listed (9th through 11th bullets) that relate to crossings and are supported by MFWP:	
The stream crossing that provides access to the Larabee Gulch Trailhead on NFSR #227-D1 would be closed to motorized use until the ford can be replaced with a bridge, bottomless arch or culvert.	(140-85) Thank you for your comment.
The stream crossing that provides access to Golden Anchor on NFSR #4100 would be closed to motorized use until the ford can be replaced with a bridge, bottomless arch or culvert.	
Two unnamed stream crossings located on NFSR #495-D1 in T8N, R6W Section 28 would be closed to motorized use until the ford can be replaced with a bridge, bottomless arch or culvert.	(140-86) Thank you for your comment.
However, relative to some of these crossings listed under the action alternatives (2, 3, 4), we found the following discrepancies:	(140-87) The proposed management decision for the ford on NFSR #4100 is listed in the Features Common to all Action Alternatives and The Design Features Specific to Alternative 5 sections of the Final EIS.
Alternative 2, Proposed Action (Other Features, pg 28). Does not reference that the stream crossing that provides access to Golden Anchor on NFSR #4100 would be closed to motorized use until the ford can be replaced with a bridge, bottomless arch or culvert. (140-85)	

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Alternative 3 (Other Features, pg 31). Does not reference that the stream crossing that provides access to Golden Anchor on NFSR #4100 would be closed to motorized use until the ford can be replaced with a bridge, bottomless arch or culvert. (180-86) Alternative 4 (Other Features, pg 34). Does not reference any of the above-bulleted stream and river ford/crossing closures as in previous alternatives. (180-87) CONCLUSION In conclusion, MFWP finds that none of the four alternatives reduces overall road densities enough to appreciably improve wildlife habitat and big game security in the Divide landscape. While road densities decrease in some areas, these gains are generally offset elsewhere. Roads open to highway-legal vehicles yearlong are only reduced by 21 miles (286 miles vs. 265 miles) when the existing condition is compared to the most dissimilar option--Alternative 4. Overall Alternative 3 is generally best for wildlife and fisheries, however, that is within the context of 4 Alternatives that (as the Big Game Security Amendment shows) are, in fact, quite similar. (140-88) In some areas big game and other wildlife have already shifted their range from public to private lands and this trend is accelerating. Low security and habitat effectiveness on the HNF are likely contributing to this problem. While big game and grizzly bears are management foci for MFWP and those concerns form the bulk of our comment, we believe that by retaining and enhancing large blocks of secure habitat and minimizing landscape fragmentation many species will benefit. Our comments are intended to provide the HNF additional options to improve travel management in the Divide landscape rather than to specifically critique the existing DEIS. We hope that our comments reflect that intent and provide MFWP and the	(140-88) Refer to Alternative 5.

Comments	Response to Comments
USFS a route forward that will best serve fish, wildlife, and their habitats. MFWP PERSONNEL Region 2 MFWP (west of the Divide) Wildlife biologist (north of US Hwy 12), Jay Kolbe (phone 499-2356 in Seeley Lake; jkolbe@mt.gov) Wildlife biologist (south of US Hwy 12), Ray Vinkey (phone 859-1704 at Philipsburg; rvinkey@mt.gov) Wildlife management specialist (bears), Jamie Jonkel (phone 542-5508 in Missoula; jajonkel@mt.gov) Fisheries biologist, Jason Lindstrom (phone 563-7435 in Anaconda; jlindstrom@mt.gov) Region 3 MFWP (east of the Divide) Wildlife biologist, Jenny Sika (phone 495-3268 in Helena; jsika@mt.gov) REFERENCES Christensen, A. G., L. J. Lyon, and J. W. Unsworth. 1993. Addressing elk management: considerations in forest plan updates/revisions. Unpublished report. USDA, Forest Service, Northern Region. 13 pages. Copeland, J. P., 1996. Biology of the wolverine in central Idaho. M.S. Thesis, University of Idaho, Moscow , USA. 138 pages.	

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(amended 1997). Missoula, Montana. United States Fish and Wildlife Service (USFWS). 2013. Draft NCDE Grizzly Bear Conservation Strategy. 158 pages. <http://www.fws.gov/mountain-prairie/species/mammals/grizzly/NCDE_Draft_CS_Apr2013_Final_Version_corrected_headers.pdf>. Accessed 10 June 2014. APPENDIX A. PURPOSES OF THE NCDE DRAFT CONSERVATION STRATEGY Describe and summarize the coordinated strategies, standards, and guidelines developed for managing the grizzly bear population, grizzly bear/human conflicts, and grizzly bear habitat to ensure their continued conservation in the NCDE. Document the regulatory mechanisms, legal authorities, policies, management documents, and monitoring programs that will maintain the recovered grizzly bear population. Document the commitments agreed to by the participating agencies. Within the NCDE, the grizzly bear population and its habitat will be managed using an approach that identifies a Primary Conservation Area (PCA) and three additional management zones (Zone 1, Zone 2, and Zone 3.) Each management zone is a mosaic of land ownerships, with different types of habitat protections reflecting the mandates and interests of each agency or Tribal government. The PCA is currently known as the NCDE Grizzly Bear Recovery Zone. None of the Forest lands within the Divide Travel Plan area fall under this category. The PCA is where the most conservative habitat protections would remain, with habitat conditions that were compatible with the increasing grizzly bear population from 2004-2011 being maintained. The PCA will be managed as a source area where the	

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goal is continual occupancy by grizzly bears. Here, secure habitat, road densities, developed sites, and livestock allotments would be maintained at levels known to be compatible with a stable to increasing grizzly bear population. In regard to the Helena National Forest, these would be the Helena NF and other federal and state lands north of MT Highway 200 in the Lincoln Ranger District. Any major "developed site" projects within the PCA that are intended to accommodate public use and recreation are subject to "developed site standards" under the Draft CS. These are the same standards currently in place to accept or deny proposed projects within the NCDE grizzly bear recovery area. The intent of these standards is not to increase the number of "developed sites," such as ski areas, snowmobile play grounds, new motorized trail loop systems, and increased capacity trail head/parking lots within the PCA. Any new projects within the PCA will require an "application ruling" (as they do now within the recovery area), and if approved will require a "corresponding reduction" such as the closure of a similar site or some other form of appropriate mitigation. Again, there are no projects within the Divide Travel Plan management area that fall under this category. Grizzly bears are also expected to occupy habitat outside the PCA in the Zones 1 and 2 portions of the Helena NF (there are Zone 2 forest lands within the Divide Travel Plan area) where they may serve as a source population to other grizzly bear ecosystems in the lower 48 States. Habitat protections are less restrictive in Zones 1 and 2. However, there will be a management emphasis to maintain habitat standards and non-motorized road and trail standards in and around existing blocks of special management lands that existed in 2011. Bear occupancy will not be actively discouraged in these two zones and the emphasis for managing habitat will be maintaining and enhancing existing conditions in roadless areas and special management habitats. Zone 1 includes major portions of the Lincoln Ranger District, but there are no Zone 1 lands within the Divide Travel Plan area. As mentioned above habitat protections in Zone 1 will focus on maintaining and limiting miles of open roads and trails in current roadless areas as stepping stones to other ecosystems.	

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Zone 2 includes all the Forest lands within the Divide Travel Plan area. Management Zone 2 will be managed to provide the opportunity for grizzly bears to move between the NCDE and adjacent ecosystems (e.g., the Greater Yellowstone Area, GYA) via the multiple large blocks of habitat with motorized use restrictions that already exist as of 2011. There are no Zone 3 designated lands with the Helena Ranger District. Zone 3 primarily consists of areas east of the Rocky Mountain Front where grizzly bears do not have enough suitable federal land-habitat to support population growth. These lands are included within the Conservation Strategy because a bear living in Zone 3 most likely originated from the NCDE population. Grizzly bear occupancy will not be actively discouraged in Zone 3, but there are limited habitat standards associated with this zone.	
(141) From: KELLY RUSOFF <kdrusoff@msn.com> Sent: Thursday, June 12, 2014 3:20 PM To: FS-comments-northern-helena Subject: Divide Travel Plan comments attached Attachments: Dividetravelplan_comments_2014.doc Sirs/Ladies: Please accept the attached comments into the record for the Draft EIS for the Divide Travel Plan. Thank you. David M. Rusoff 6/12/14 David M. Rusoff	(141-1) Refer to Alternative 5. (141-2) This is beyond the scope of the Divide Travel Plan. (141-3) Refer to Alternative 5. (141-4) Refer to Alternative 5. The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities. (141-5) Based on updated information, three out of six elk herd units meet Standard 4a in the FEIS (See Wildlife section, Chapter 3 and Forest Plan amendment, Comparison of Alternatives/Alternative A). Ranger - Alternative Note: Assuming that this comment pertains only to the CDNST. If not, than this comment is out of the scope of this planning effort

Comments	Response to Comments
173 Briarwood Lane Helena, MT 59601 June 12, 2014 Heather DeGeest Helena District Ranger Helena Ranger District 2001 Poplar Street Helena, MT 59601 Submitted by E-mail on June 12, 2014 Re: Comments on HNF Divide Travel Plan Draft Environmental Impact Statement Dear Ms. DeGeest: I'm writing to submit general and specific comments regarding the Proposed Action for the Divide Travel Plan. I've lived in Helena for 26 years, and I've hiked most of the Continental Divide National Scenic Trail and numerous other trails within the travel planning area. I've also led group hikes into the Nevada Mountain Roadless Area. I have a strong interest in this travel planning, I commented at the beginning of the process, and I appreciate the opportunity to comment again. GENERAL COMMENTS The Travel Plan Should Protect the Primitive Values of the Continental Divide National Scenic Trail: Hikers come from all around to hike the Continental Divide National Scenic Trail for a primitive hiking experience, away from motor vehicles. 16 USC § 1246(c) prohibits use of motorized vehicles by the public along any national scenic trail,	(141-6) This comment is addressed by the road closures associated with Alternative 5. (141-7) Refer to Alternative 5. (141-8) Refer to Alternative 5. (141-9) Thank you for your comment. (141-10) Thank you for your comment.

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with certain exceptions. The intent of Congress, in enacting the National Scenic Trail System, was to restrict motorized traffic to the extent possible, and national Forest Service policy has been to try to eliminate motorized use on the CDNST whenever reasonably possible. In 1997, Deputy Chief Forester Robert C. Joslin issued a memorandum stating, in part, that: "It is the intent of the Forest Service that the CDNST will be for non-motorized recreation." To achieve the intent of a primitive trail, and to maintain the Continental Divide as a meaningful wildlife corridor, please close all trail portions of the Continental Divide Scenic Trail to motor vehicles, year around, and create as much of a quiet, non-motorized buffer for the trail as possible by closing to motorized travel those sections of Helena National Forest roads that lead to the CDNST or intersect it, except for the roads that have been specifically found to be reasonably necessary for reasons other than motorized recreation. (141-1) For example, people have used the Helmville-Gould Trail to access the Nevada Mountain Roadless Area with motor vehicles. Closing this route to motor vehicles from the Marsh Creek side should significantly reduce this illegal incursion. (141-2) The Travel Plan Should Emphasize Quiet Trails throughout the Planning Area: The travel plan should emphasize the value of quiet areas and the displacement of wildlife and non-motorized hikers, hunters, and other recreationists by off-road motor vehicle traffic. Due to the high number of miles of open roads on the HNF, a reasonable balance of non-motorized and motorized recreation opportunities can be obtained by closing all trails to motorized use and by closing unnecessary roads. Maintaining the traditional distinction between roads and trails is necessary to: maintain high quality wildlife habitat into the future, including protection of threatened and endangered species; minimize soil erosion; minimize the spread of noxious weeds and the threat they pose to native vegetation; provide quiet trails for traditional forest recreation; and to avoid user conflicts. (141-3)	

Comments	Response to Comments
The Travel Plan Should Protect the Remaining Roadless Areas in the Planning Area: The travel plan should prohibit all motor vehicle travel, winter or summer, in the roadless areas within the planning area. According to the Forest Service's own studies, a motorized route in a roadless area removes primitive characteristics for three miles on either side of the route. USDA Forest Service ROS Users Guide, p. 18 (August 1982). (141-4) The Travel Plan Should Reduce Road Density to Appropriate Standards for Wildlife Protection: The DEIS states that elk hiding cover requirements are not being met in most portions of the planning area, due to road density and tree insect infestations. This supports closing all trails to motor vehicles year around and reducing road density to the extent necessary to protect wildlife habitat and security. (141-5) The Travel Plan Should Protect Traditional Hunting Opportunities and Ethics: Studies show that the harvest of bull elk increases with increased hunter access. Eventually, this will lead to reduced elk populations and hunting opportunities. Elk use and numbers decline in areas adjacent to roads open to motorized vehicles, and the (141-6) sound of an ATV is likely to chase deer and elk away from other hunters. Hunters who have walked into a prime location may have their efforts spoiled by an ATV, and some hunters use ATVs to pursue game off designated routes. The only way to control conflicts with pedestrian and horseback hunters and limit off-route motorized pursuit of game is to prohibit motorized use of trails. SPECIFIC COMMENTS Please Close Forest Road 227-E1 from Kading Campground to the trailhead for the	

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Electric Peak Roadless Area (Trail 329 to Blackfoot Meadows): As proposed under Alternative 3, please close to motorized traffic the approximate one-mile length of road from the turnaround at Kading Campground south to the northern edge of the Electric Peak Roadless Area. This narrow road is not maintained and is seriously rutted in wet weather. Off-road motorized traffic in wet weather also has created deep ruts leading from the road to camping areas near the river. I've walked this road many times, and closing it would create a buffer for the roadless area and would create a nice quiet, accessible family trail for Kading Campground users and other hikers. Also, motorized access to the user created camping area at the end of the road is not necessary because of the close proximity of the campground and dispersed camping sites off the main road, north of the campground. (141-7) Please Close the Kading Grade Trail to Motor Vehicles Year Around: Please also close the Kading Grade Trail to motor vehicles year around to protect the primitive qualities of the Electric Peak Roadless Area and wildlife habitat in the area. I've hiked this route, and non-motorized travel is much more compatible with the primitive nature of the area and wildlife security needs than motorized travel. (141-8) Proposal to Adopt Certain Non-System Routes: The travel plan should not adopt any recently created user-created routes. (141-9) While off-route travel, in general, may not have been specifically prohibited in some areas in the past, creation of unauthorized roads and trails constitutes a criminal act in violation of federal law. Adopting user-created roads and trails in the planning process only provides an incentive for further user-created routes and continued destruction of forest resources. In a February 25, 1997, letter to FWP, Dennis Hart, then Helena District Ranger,	

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wrote: “Each year, new trails are being illegally constructed on National Forest system lands by a handful of forest users. These routes were never proposed, analyzed or identified for public input in compliance with the National Environmental Policy Act. Although public lands may be open to motorized recreation, federal regulations prohibit the unauthorized construction or maintenance of trails. Increasingly each year, new trail routes are being illegally constructed . . . . In many cases, these trails have been built specifically to accommodate ATVs . . . illegal trails are not recognized as a segment of the forest transportation system. Unauthorized trails on National Forest lands often create serious management and resource conflicts . . . it’s important to close the unauthorized trails before motorized use becomes established.” Former HNF Supervisor Tom Clifford repeated the same message in a memo to HNF District Rangers, dated August 22, 2002, citing the federal regulations quoted above and stating that: “I am asking District Rangers to please take the steps necessary to protect our traditional trails system.” Although some non-system routes may have been historic routes that just weren’t formally designated as HNF routes when system routes were first designated, all non-historic user-created routes should be closed year-long to motor vehicle travel and obliterated as resources allow, in order to deter further illegal motorized traffic off designated routes. (141-10) Thank you for your work on this project and for considering my comments. Sincerely, David M. Rusoff, DMR	
(142)) From: Patti Steinmuller <psteinmul@msn.com>	

Comments	Response to Comments
Sent: Thursday, June 12, 2014 4:17 PM To: FS-comments-northern-helena Cc: psteinmul@msn.com Subject: Divide Travel Plan June 12, 2014 Heather DeGeest Helena District Ranger Helena National Forest Attn: Divide Travel Plan 880 Skyway Drive Helena, MT 59602 Dear District Ranger DeGeest: I am strongly supportive of protected public lands, wilderness and quiet trails and urge you to adopt Alternative #3 of the "Divide' Travel Plan and Continental Divide Trail (CDT) corridors as follows: 1. Protect Nevada Mountain wildlands along the CDT by adopting Alternative #3, the only alternative based on a collaborative winter agreement endorsed by the Montana Snowmobile Association, Montana Fish Wildlife and Parks and the Montana Wilderness Association in 2005.	
2. Protect the CDT corridor between Bison Mountain and the headwaters of Ontario Creek by extending non-motorized, year-round area protection to all Little Blackfoot Roadless Lands. (142-1)	(142-1) Thank you for your comment.
3. Expand year-round non-motorized area protection to the CDT corridor from MacDonald-Priest Pass; Priest to Mullan Pass. (142-2)	(142-2) Refer to Alternative 5.

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As you know, trail work is ongoing on the CDT by the Montana Wilderness Association of which I am a member. This work is extremely important to completion of the CDT. Thank you for the District's work in rehabilitating vehicle damage in Sweeney Creek as a proposed non-motorized area. I also request that this quiet trail area be extended to the CDT. Thank you for the opportunity to comment. Sincerely, Patti Steinmuller 14665 Spanish Breaks Trail Gallatin Gateway, MT 59730 406-763-4145 psteinmul@msn.com	
(143) From: Janet Tatz <janetilene@gmail.com> Sent: Thursday, June 12, 2014 10:05 AM To: FS-comments-northern-helena Subject: Protect the Nevada Mountain wildlands area along the CDBST Hello, I am writing today to urge you to support Alternative #3 which would protect the Nevada Mountain area and the CDT corridor. As you well know, this area is home to many wild and endangered species. It is unique in its beauty and landscape. This area deserves to be preserved as roadless land. I am asking you to extend year round motor free management of the headwaters of the Little Blackfoot area, as well. (143-1) I do appreciate your having restored and rehabilitated the vehicle damaged Sweeney Creek area. I am now asking you to extend that quiet, non-motorized expanse to	(143-1) Thank you for your comment.

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include the CDNST. Thank you. Janet Tatz Helena, Montana	
(144) From: Dick Thweatt <thweatt@q.com> Sent: Thursday, June 12, 2014 4:42 PM To: FS-comments-northern-helena Cc: Suzanne Thweatt Subject: Divide Travel Plan To Helena District Ranger Heather DeGeest: Greetings and welcome to Helena if you have come from elsewhere. I hope your duties allow you to get out of the office and see a lot of the country you are working with. We are very fortunate here in Helena to live in the midst so many beautiful places in the Helena Ranger District. I am writing to urge you to fully protect the Continental Divide Trail corridor all through the Helena Ranger District. My wife and I have been working on hiking all the segments of the local CDT for years and I think we have about done it. One of our favorite areas is Nevada Mountain. It is probably the wildest part of the CDT on the district. The flowers, the vistas, the quiet, and the solitude remind me of being somewhere in the Bob, and yet it is within range for a day hike from Helena. So please continue to protect the Nevada Mountain area from motorized use year around. (144-1) Another special area is the headwaters of the Little Blackfoot River. We have camped there in the winter and skied up Bison Mountain and I have walked back to Helena from Little Blackfoot Meadows. It's pretty neat to have a virtual wilderness within a 3-day walk of my front door.	(144-1) Refer to Alternative 5.

Comments	Response to Comments
There are many miles of road and trail open to motorized users in the Helena Ranger District, including most of the CDT in the district. Please protect those remaining places that are motor-free. Walking on a foot path is a whole different experience than walking on a dusty, motorized mini-road. Please adopt Alternative 3 for the Divide Travel Plan. Users of the CDT deserve to experience wild and quiet places along the way. That's what gives hiking the CDT its allure, and we should protect that forever. Thank you. Sincerely, Dick & Suzanne Thweatt 36 Harrison Avenue Helena MT 59601 443-3708	
(145) From: sara toubman <stoubman@gmail.com> Sent: Thursday, June 12, 2014 11:45 AM To: FS-comments-northern-helena Subject: Divide Travel Plan Attachments: Divide Travel Plan.doc My comments are attached below. Thanks for the opportunity to comment. Will you acknowledge receiving them? Thanks. Sara Toubman I am writing in regards to the Divide Travel Plan and to ask the Helena District to please protect the Continental Divide Trail and surrounding wildlands. Please adopt Alternative #3 and the CDT corridor protections.	(145-1) Thank you for your comment

Comments	Response to Comments
I always dreamt of hiking the Appalachian Trail from Georgia to Maine. The other two spectacular north-south mountain trails in this country are the Pacific Crest Trail and the CDT. Every time I walk a segment of any of the trails, including the CDT, I feel like I'm on sacred ground. They are cherished by thousands. Nevada Mountain area near Helena is one of the wildest areas around. I have hiked several of the trails and skied the ridges. Alternative #3 will protect it. The Little Blackfoot Roadless area is also a nearby gem that has a multitude of wildlife (I've seen moose, bear and elk), great trails and excellent back-country camping. It is another gem that will be protected by Alternative #3. And I'm excited to learn that Sweeney Creek is proposed as non-motorized and will be rehabilitated. These are all local areas that are loved. Thank you, Sara Toubman 940 Wilder Ave Helena MT 59601 406-442-1271 stoubman@gmail.com	
(146) From: Cailin O'Brien-Feeney <cobrienfeeney@winterwildlands.org> Sent: Thursday, June 12, 2014 5:07 PM To: FS-comments-northern-helena-helena Subject: Divide Travel Plan - DEIS Comments Attachments: Mount Jefferson Snowmobile Monitoring Report May 2014.pdf; WWA Divide Travel Plan DEIS comments 6 12 14.pdf Ranger DeGeest, Please find attached the comments of Winter Wildlands Alliance regarding the Divide Travel Plan DEIS, as well as an addendum. Thank you for considering our input on how to strengthen this important plan.	(146-1) Thank you for your comment. (146-2) Refer to Alternative 5. (146-3) Thank you for your comment. (146-4) Thank you for your comment. Refer to Alternative 5.

Comments	Response to Comments
Please add us to the project mailing list moving forward. Regards, Cailin O'Brien-Feeney -- _____ Cailin O'Brien-Feeney Policy Director Winter Wildlands Alliance (208) 336-4203, x4 June 12, 2014 Heather Degeest Helena District Ranger, Helena National Forest 2880 Skyway Lane Helena, Montana 59602 Submitted via email to: comments-northern-helena-helena@fs.fed.us RE: Continental Divide Travel Plan DEIS Dear Ranger Degeest,	

Comments	Response to Comments
Winter Wildlands Alliance (WWA) is a national advocacy organization representing the interests of human-powered winter recreationists across the U.S. Collectively, WWA represents over 50,000 members and 35 grassroots partner organizations in 10 states, including Montana. One of these groups with a strong connection to the project area is Montana Wilderness Association. Opportunities for quality, non-motorized winter recreation, are of utmost importance to our members – many of whom enjoy cross-country skiing and snowshoeing along the Continental Divide National Scenic Trail on the Helena Ranger District. This travel plan is one way to ensure such opportunities are protected, and the landscapes in which they occur are conserved. To that end, we appreciate that the Helena National Forest is analyzing year-round motor vehicle use. Here, our comments focus on over-snow vehicle use – including seasonal restrictions – and also reference, and reinforce, some aspects of DEIS comments submitted by the Montana High Divide Trails Partnership, of which Montana Wilderness Association is a member. In particular, we support the development of an Alternative 3a (or 3+), as detailed in their comments. Consistency with Forest Plan Direction The 1986 Helena National Forest Plan offers important direction regarding Recreational Opportunity Spectrum (ROS), management of Primitive areas, recommended wilderness and the Continental Divide National Scenic Trail – among other topics – which are relevant for consideration in the Divide Travel Plan. The Forest Plan1 standard relating to the Continental Divide National Scenic Trail clearly states that: 1 1986 Helena National Forest Plan	

Comments	Response to Comments
http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5352772.pdf “Once the comprehensive plan is approved, management direction will be incorporated further into this plan. Based on the Comprehensive Plan, a more detailed analysis will be completed showing trail segments, objectives and specific route locations.” Travel plans must, in turn, adhere to the relevant Forest Plan, as well as travel planning regulations. A comprehensive plan for the Continental Divide National Scenic Trail was finalized in 2009, and is discussed more in the next section. The Forest Plan also provides important direction for wild lands that would be impacted by this decision. Nevada Mountain inventoried roadless area – an “R-1” class (non-motorized) Primitive Management Area – is one such area that deserves to be protected for its wilderness character. The Divide Travel Plan DEIS has some critical gaps in its analysis for Nevada Mountain that should be corrected with respect to over-snow vehicle use, including a cumulative impacts analysis of cross-country snowmobile use. Also, we encourage utilizing an “all lands” approach to evaluate user conflict, boundary confusion and other factors related to the adjoining non-motorized areas on the Lincoln Ranger District. This seems especially relevant since consistency and simplicity are stated goals of this travel planning process, and disjointed winter recreation management consistently results in noncompliance. (146-1) Please see the included report “Mount Jefferson Snowmobile Monitoring Report May 2014” as a cautionary tale of what the Helena Ranger District might reasonably expect if the Nevada Mountain and Electric Peak roadless areas are open to over-snow vehicle use, as proposed in the DEIS. Continental Divide National Scenic Trail	

Comments	Response to Comments
The Continental Divide National Scenic Trail – a 3,100 mile route from Mexico to Canada – was established in 1978, and is one of the some outstanding primitive recreation opportunities in America. It traverses public lands managed by the Forest Service, Bureau of Land Management and National Park Service, with overall direction coming from the 2009 Continental Divide National Scenic Trail (CDNST) Comprehensive Plan2. Several elements of that plan detail the purpose and management direction of the CDT bear mention, providing useful context for the travel management decisions being considered here. 2 2009 Continental Divide National Scenic Trail Comprehensive Plan http://www.fs.fed.us/cdt/main/cdnst_comprehensive_plan_final_092809.pdf The purpose of the CDNST, as stated in the 2009 plan, includes providing a high-quality recreational experience for hikers and horseback riders (non-motorized users) in a relatively unaltered natural landscape. The plan clearly states that "cross-country skiing, and snowshoeing are compatible with the nature and purposes of the CDNST" and references a 1997 Forest Service memorandum regarding the CDNST that "it is the intent of the Forest Service that the CDNST will be for non-motorized recreation." Over-snow vehicle use allowable on the CDNST only if that use is consistent with the applicable land management plan, and such use "will not substantially interfere with the nature and purposes of the CDNST." It is unclear that both of these standards have been met with respect to the potential environmental and user-experience impacts of over-snow vehicle use for lands both on, and surrounding, the CDNST. We request that the required analysis of over-snow vehicle impacts be analyzed in preparing the Final EIS. At a minimum, recommend that the corrdior of CDNST in Electric Peak Roadless Area should match year round non-motorized area of adjoining Beaverhead-Deerlodge National Forest. (146-2) Adherence to the 2005 Winter Travel Agreement	

Comments	Response to Comments
Winter travel planning can be a daunting task – and we again want to commend the Helena Ranger District for addressing it alongside summer travel planning – but there are ways to conduct the process such that the result is fair, effective, and durable. One such approach is collaboration, which requires time, trust and commitment by all stakeholders. The Helena Ranger District is fortunate that a group of stakeholders – representing motorized, non-motorized, conservation and wildlife interests – put in this hard work, resulting in the Lincoln-Continental Divide Winter Recreation Agreement. But no Alternative presented reflects all of that agreement, and only Alternative 3 does in part. More troubling is that no analysis or explanation for why is offered. While the agreement is not binding, the forest has committed to giving it serious consideration, and is the best blueprint available for what can work for this area. The agreement deserves consideration, in full, in the Final EIS. (146-3) Summary Recommendations We would like to offer the following specific recommendations in addition to the comments above regarding consistency with the 1986 Forest Plan, Continental Divide National Scenic Trail Management Direction, and adherence to the 2005 winter travel agreement. ☐ For the aforementioned reasons, the Divide Travel Plan should fully adopt recommendations from the 2005 winter recreation agreement. If this does not occur, provide analysis showing why. ☐ The small quiet winter area by the MacDonald Pass Cross Country Ski Area should extend north along the Continental Divide Trail to Priest Pass; and also from Priest Pass north to Mullan Pass should be classed as a non-motorized recreation area to protect the high quality quiet winter recreation experiences along the CDNST. ☐ The corridor of CDNST in Electric Peak Roadless Area should match the	

Comments	Response to Comments
adjoining year-round non-motorized area of the Beaverhead-Deerlodge National Forest. (146-4) Thank you for considering our comments on the Divide Travel Plan EIS. We look forward to staying engaged as the process continues. Sincerely, Cailin O'Brien-Feeney Policy Director Winter Wildlands Alliance	
(147) From: Brian McDaniel [mailto:mtmtnman@bresnan.net] Sent: Friday, June 13, 2014 6:08 AM To: FS-hlcplanrevision Subject: forest plan revisions I will get to the point, just shut it down to motorized use. (147-1) After growing up on Priest Pass and seeing first hand what it used to be, to what it has become is very disappointing. Its more like a dump now than a forest. Couches, recliners, TV's, old vehicles, and even construction materials like dump beds full of shingles and tar paper. Have even found people taking live trees with heavy equipment to sell for lumber I would assume. I don't like shutting it down to motorized use as I own dirt bikes and a quad. But if that means stopping the vandalism, bringing better hunting back to the area, and especially before a fire gets going up there and destroys homes and lives...then by all means shut it down, I can walk.	(147-1) The Forest Service strives to strike a balance with respect to resource protection and providing diverse recreation opportunities.

Comments	Response to Comments
Thank you Brian McDaniel 406-461-9670	
(148) From: Len Kopec To: FS-comments-northern-helena-lincoln Subject: Divide Travel Plan Date: Thursday, June 12, 2014 9:11:06 AM District Ranger DeGeest, As a year-round forest recreation user and ardent supporter of wild lands, I am asking that you adopt alternative 3 and protect the CDT corridor from motorized use. There is so much of the forest, the state, and the nation's public lands that are open to motorized use that we need to work to keep the quiet places that remain. Here in Montana it seems like we have a lot of wild land, but consider how much of that has been lost in just a couple of generations. We can't let more slip away or in a couple more generations there will be none left. I've been all over the world and have seen the remnants that some countries are scrambling to save. They realized too late just how valuable quiet, wild land is to the community and to the general health and welfare of the whole population. Here in Montana we still have the opportunity to do some really good things regarding wild land, wildlife, and ecosystem protection. Please consider protecting the CDT corridor as much as possible. Sincerely, Len Kopec PO Box 666 Augusta, MT 59410 562-3668	(148-1) Thank you for your comments.

Appendix E – Route-by-Route Table

Table 17 – Codes and Corresponding Descriptions

Table Code	Description
01-RES	Roads closed to motorized vehicles yearlong, including over snow motorized vehicles (All Alternatives)
02-RES	Roads open to highway legal vehicles 12/2-10/14 (Alt 1) Open to over snow motorized vehicles12/2-10/14 (Alt 1)
03-RES	Roads open to highway legal vehicles 5/16-12/1 (All Alternatives) Open to over snow motorized vehicles 12/2-5/15 (Alt 2, Alt 3 & Alt 4)
05-RES	Roads open to highway legal vehicles 5/16-10/14 (Alt 2 & Alt 3) Open to over snow motorized vehicles 12/2-5/15 (Alt 2,Alt 3, Alt 4, Alt 5)
06-RES	Roads closed to wheeled motorized vehicles yearlong (All Alternatives) Open to over snow motorized vehicles 12/2-10/14 (Alt 1) Open to over snow motorized vehicles 12/2-5/15 (Alt 2,Alt 3,Alt 4,Alt 5)
06-RES-SPC	Open designated routes to over snow motorized vehicles 12/2-5/15 (Alt 2)
07-RES	Roads open to highway legal vehicles 10/15-12/1 (Alt 2 and Alt 4) Open to over snow motorized vehicles 12/2-5/15 (Alt 2 and Alt 4)
13-RES	Roads open to wheeled motorized vehicles 6/1-8/31 (Alt 1) Open to over snow motorized vehicles 12/1-8/31 (Alt 1)
15-RES	Roads open to wheeled motorized vehicles 5/16-4/14 (Alt 1) Open to over snow motorized vehicles, no seasonal restrictions (Alt 1)
OPEN-HWY LEGAL	Roads open to highway legal vehicles, no seasonal restrictions (All Alternatives)
OPEN-PVT	Private roads within project boundary (All Alternatives)
U OPEN-HWY LEGAL	Open non-system roads & trails (Alt 1)
CDNST	Continental Divide System Trail
M-07	Trails open to vehicles 50” or less in width, no seasonal restriction (Alt 1)
M-08.01	Continental Divide National Scenic Trail CDNST (All Alternatives)
MT	Trails open to vehicles 50” or less in width, no seasonal restrictions (Alt 2)
MT 5/16-10/14	Trails open to vehicles 50” or less in width 5/16-10/14 (Alt 2,Alt 3,Alt4, Alt 5)
MT 5/16-8/31	Trails open to vehicles 50” or less in width 5/16-08/31
MT NEW 5/16-10/14	Proposed New construction Motorized Trails 50" or less in width 5/16-10/14
MT NEW 5/16-8/31	Proposed New Construction Motorized Trails 50" or less in width 5/16-8/31
MT-01-RES	Motorized Trails-Closed to Motorized Use
NM	Non-motorized system trail (All Alternatives)
NOMTR	Non-motorized system trail (All Alternatives)
NS-01-RES	Non-system roads, closed to motorized vehicles yearlong (Alt 2,Alt 3 &Alt 4)
NS-01-RES	Non-system roads, closed to motorized vehicles yearlong (Alt 2 & Alt 3)

Table 18 – Route by Route Comparison

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1016	0.694	15-RES	03-RES	03-RES	03-RES	OPEN-HWY LEGAL
1016-A1	0.142	15-RES	03-RES	03-RES	03-RES	OPEN-HWY LEGAL
1017	0.897	15-RES	03-RES	03-RES	03-RES	OPEN-HWY LEGAL
1017-A1	0.241	15-RES	03-RES	03-RES	03-RES	OPEN-HWY LEGAL
1018	0.377	15-RES	03-RES	03-RES	03-RES	OPEN-HWY LEGAL
1041	0.460	01-RES	01-RES	01-RES	01-RES	01-RES
123	0.500	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
123	0.052	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
123	0.107	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
123	0.041	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
123	2.305	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
123-013	0.110	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES
123-014	0.113	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
123-017	0.043	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES
123-018	0.488	U OPEN-HWY LEGAL	NS-01-RES	NS-01-RES	NS-01-RES	NS-01-RES
123-A1	0.282	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
123-A2	0.232	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
136	0.892	CO	CO	CO	CO	CO
136	0.364	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
136	1.356	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
136	1.344	CO	CO	CO	CO	CO
136	2.400	CO	CO	CO	CO	CO
136	8.235	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
136	3.500	CO	CO	CO	CO	CO
136	2.064	CO	CO	CO	CO	CO
136	0.105	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
136-007	1.277	U OPEN-HWY LEGAL	MT	NS-01-RES	MT 5/16-10/14	CDNST
136-A1	1.140	01-RES	06-RES	06-RES	06-RES	06-RES
136-A2	0.676	01-RES	06-RES	06-RES	06-RES	06-RES
136-A3	0.050	01-RES	06-RES	06-RES	06-RES	06-RES
136-A3	0.112	01-RES	01-RES	01-RES	01-RES	06-RES
136-B1	0.671	01-RES	06-RES	06-RES	06-RES	06-RES
136-B2	1.137	01-RES	06-RES	06-RES	06-RES	06-RES
136-B2	0.484	01-RES	01-RES	06-RES	01-RES	06-RES
136-B3	0.457	01-RES	06-RES	06-RES	06-RES	06-RES
136-B4	0.138	01-RES	06-RES	06-RES	06-RES	06-RES
136-B5	0.605	01-RES	06-RES	06-RES	06-RES	06-RES
136-B7	0.241	01-RES	06-RES	06-RES	06-RES	06-RES
136-B8	0.168	01-RES	06-RES	06-RES	06-RES	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
136-C1	2.038	01-RES	06-RES	06-RES	06-RES	06-RES
136-C1	0.500	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
136-C2	0.247	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
136-C3	0.063	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
136-D1	0.500	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
136-D1	2.008	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	01-RES
136-D2	0.242	01-RES	06-RES	06-RES	06-RES	06-RES
136-E1	0.312	01-RES	06-RES	06-RES	06-RES	06-RES
136-F1	0.468	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
136-G1	0.224	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1801	3.916	01-RES	06-RES	06-RES	06-RES	01-RES
1801	0.189	01-RES	01-RES	01-RES	01-RES	01-RES
1801-A1	3.107	01-RES	06-RES	06-RES	06-RES	01-RES
1801-A2	0.396	01-RES	06-RES	06-RES	06-RES	01-RES
1801-A3	0.788	01-RES	06-RES	06-RES	06-RES	01-RES
1801-A4	0.523	01-RES	06-RES	06-RES	06-RES	01-RES
1801-B1	0.442	01-RES	06-RES	06-RES	06-RES	01-RES
1802	2.647	03-RES	03-RES	03-RES	01-RES	05-RES
1802	0.047	03-RES	03-RES	03-RES	01-RES	01-RES
1802-A1	0.761	01-RES	01-RES	01-RES	01-RES	01-RES
1802-B1	0.217	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	01-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1802-B2	2.041	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	01-RES
1802-C1	0.633	03-RES	03-RES	03-RES	01-RES	01-RES
1802-C1	0.998	03-RES	03-RES	03-RES	03-RES	01-RES
1802-C1	1.172	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1805	4.400	CO	CO	CO	CO	CO
1805	1.600	CO	CO	CO	CO	CO
1805	11.523	CO	CO	CO	CO	CO
1805-001	0.107	U OPEN-HWY LEGAL	06-RES	06-RES	06-RES	NS-01-RES
1805-002	0.388					MT NEW 5/16-10/14
1805-A1	0.287	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	05-RES
1805-A1	0.570	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-10/14
1805-A1	0.336	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1805-A2	0.165	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-10/14
1805-A2	0.201	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1805-B1	0.803	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1805-B2	0.297	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	01-RES
1805-B2	1.018	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1805-B3	0.253	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1805-B3	0.256	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1805-C1	0.305	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	01-RES
1805-C1	0.466	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1805-C2	0.185	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1805-C2	0.074	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1805-C3	0.112	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1805-D1	0.207	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	01-RES
1805-D3	0.266	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1805-D4	0.127	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	01-RES
1805-D4	0.170	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1805-E1	0.463	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1805-E1	0.944	OPEN-HWY LEGAL	01-RES	01-RES	01-RES	01-RES
1811	1.734	01-RES	06-RES	06-RES	06-RES	MT 5/16-8/31
1813	1.516	01-RES	01-RES	01-RES	01-RES	01-RES
1813-C1	0.485	01-RES	01-RES	01-RES	01-RES	01-RES
1836	1.274	06-RES	06-RES	06-RES	06-RES	06-RES
1836-A1	0.097	06-RES	06-RES	06-RES	06-RES	06-RES
1845	1.968	01-RES	06-RES	01-RES	01-RES	OPEN-HWY LEGAL
1846	0.362	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1846	1.268	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1849	3.532	01-RES	06-RES	06-RES	06-RES	06-RES
1849	0.819	OPEN-HWY	OPEN-HWY	OPEN-HWY	OPEN-HWY	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
		LEGAL	LEGAL	LEGAL	LEGAL	
1849-A1	2.388	01-RES	06-RES	06-RES	06-RES	06-RES
1850	1.204	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1851	0.134	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1851	0.905	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1851	0.217	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1852	1.234	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1852	0.025	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	OPEN-HWY LEGAL
1852	1.607	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1852-A1	2.003	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1852-B1	0.688	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1852-C1	0.911	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT
1852-C2	0.568	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1852-D1	0.506	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1852-D2	0.351	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1853	1.343	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1853	0.540	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1853-A1	1.456	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1853-B1	0.391	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1853-B3	0.319	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1853-B4	0.319	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1853-C1	1.312	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1853-C3	0.510	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1853-D1	0.823	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1853-D2	0.336	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1853-E1	1.200	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1853-E3	0.100	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1853-E3	0.297	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1854	0.595	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1854	0.808	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1854-A1	0.672	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1855	0.241	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855	0.673	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1855	1.200	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855	0.585	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855	0.079	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855	1.404	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855	0.255	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855	0.598	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855	0.646	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855	0.551	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855	0.056	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855	0.800	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855-001	0.568	U OPEN-HWY LEGAL	06-RES	06-RES	06-RES	NS-01-RES
1855-002	0.476	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855-004	0.802	U OPEN-HWY LEGAL	06-RES	06-RES	06-RES	NS-01-RES
1855-A1	1.667	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1855-A2	1.037	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1855-A3	0.067	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1855-A3	0.633	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1855-A4	0.181	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1855-A4	0.086	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1855-A5	0.797	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1855-B1	0.912	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1855-B2	1.283	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1855-B3	0.285	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1855-B4	0.340	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1855-B5	0.180	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1855-B6	0.183	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1855-B7	0.070	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1855-C1	1.155	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1855-C2	1.081	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1855-C3	1.882	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1855-C3	0.292	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1855-C4	1.377	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1855-C5	0.377	OPEN-HWY	06-RES	06-RES	06-RES	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
		LEGAL				
1855-D1	0.334	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1855-E1	0.421	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1855-F1	0.169	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1855-G1	0.487	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1856	2.300	06-RES	07-RES	06-RES	06-RES	06-RES
1856	1.784	06-RES	06-RES-SPC	06-RES	06-RES	01-RES
1856	3.683	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1856	1.720	06-RES	07-RES	06-RES	06-RES	01-RES
1856-B1	0.586	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1856-C1	2.200	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1856-D1	2.158	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1856-D2	0.157	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1856-E1	0.689	06-RES	06-RES	06-RES	06-RES	06-RES
1856-F1	1.185	06-RES	06-RES	06-RES	06-RES	06-RES
1856-G1	0.964	06-RES	06-RES	01-RES	01-RES	01-RES
1856-G1	0.957	06-RES	06-RES	06-RES	06-RES	01-RES
1856-H1	1.396	06-RES	06-RES	01-RES	01-RES	01-RES
1856-I1	0.244	06-RES	06-RES	06-RES	06-RES	01-RES
1856-J1	1.081	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1857	3.660	15-RES	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1857	0.095	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1857	0.700	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1857-008	0.707	U OPEN-HWY LEGAL	NS-01-RES	NS-01-RES	NS-01-RES	NS-01-RES
1857-A1	0.348	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	MT 5/16-8/31
1857-A1	0.604	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1857-A1	3.135	01-RES	05-RES	05-RES	05-RES	MT 5/16-8/31
1857-A2	1.121	01-RES	06-RES	06-RES	06-RES	06-RES
1857-A3	0.712	01-RES	06-RES	06-RES	06-RES	06-RES
1857-A4	0.772	01-RES	06-RES	06-RES	06-RES	06-RES
1857-A5	0.974	01-RES	06-RES	06-RES	06-RES	06-RES
1857-B1	0.397	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1857-B1	0.512	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES	OPEN-HWY LEGAL	06-RES
1857-B1	0.093	15-RES	06-RES	06-RES	06-RES	06-RES
1857-B1	0.049	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1857-B1	0.006	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1857-B1	0.505	15-RES	06-RES	06-RES	06-RES	MT 5/16-8/31
1857-B1	0.410	15-RES	06-RES	06-RES	06-RES	06-RES
1857-B2	0.627	06-RES	06-RES	06-RES	06-RES	06-RES
1857-B3	0.078	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1857-B3	0.090	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1857-B3	0.286	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES	OPEN-HWY LEGAL	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1857-B3	1.052	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES	OPEN-HWY LEGAL	06-RES
1857-B4	0.687	06-RES	06-RES	06-RES	06-RES	MT 5/16-8/31
1857-B5	0.361	06-RES	06-RES	06-RES	06-RES	06-RES
1857-C1	0.319	06-RES	06-RES	06-RES	06-RES	06-RES
1857-D1	1.962	06-RES	OPEN-HWY LEGAL	06-RES	06-RES	MT 5/16-8/31
1857-D2	0.650	06-RES	OPEN-HWY LEGAL	06-RES	06-RES	06-RES
1857-D3	0.336	06-RES	06-RES	06-RES	06-RES	06-RES
1857-D4	0.084	06-RES	06-RES	06-RES	06-RES	06-RES
1857-D5	0.100	06-RES	06-RES	06-RES	06-RES	06-RES
1857-E1	0.180	06-RES	06-RES	06-RES	06-RES	06-RES
1857-E1	0.327	06-RES	06-RES	06-RES	06-RES	MT 5/16-8/31
1857-F1	0.419	06-RES	06-RES	06-RES	06-RES	06-RES
1857-G1	0.345	06-RES	06-RES	06-RES	06-RES	06-RES
1857-G2	0.222	06-RES	06-RES	06-RES	06-RES	06-RES
1857-G3	0.099	06-RES	06-RES	06-RES	06-RES	06-RES
1859	1.800	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1859	0.962	06-RES	OPEN-HWY LEGAL	06-RES	06-RES	MT 5/16-8/31
1859	1.623	06-RES	06-RES	06-RES	06-RES	06-RES
1859	0.924	06-RES	OPEN-HWY LEGAL	06-RES	06-RES	06-RES
1859-B1	0.069	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1859-B1	2.179	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1859-B2	0.150	06-RES	06-RES	06-RES	06-RES	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1859-D1	0.764	06-RES	06-RES	06-RES	06-RES	06-RES
1859-D2	0.414	06-RES	06-RES	06-RES	06-RES	06-RES
1859-D3	0.222	06-RES	OPEN-HWY LEGAL	06-RES	06-RES	06-RES
1859-D4	1.030	06-RES	OPEN-HWY LEGAL	06-RES	06-RES	MT 5/16-8/31
1859-E1	0.517	01-RES	OPEN-HWY LEGAL	06-RES	06-RES	06-RES
1859-E1	1.169	01-RES	OPEN-HWY LEGAL	06-RES	06-RES	MT 5/16-8/31
1859-E2	0.185	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES	06-RES	06-RES
1859-F1	1.054	01-RES	06-RES	06-RES	06-RES	06-RES
1859-G1	0.090	06-RES	06-RES	06-RES	06-RES	06-RES
1860	1.247	OPEN-HWY LEGAL	MT 5/16-10/14	01-RES	MT-01-RES	MT-01-RES
1860	0.352	OPEN-HWY LEGAL	MT 5/16-10/14	01-RES	01-RES	01-RES
1860	0.721	CO	CO	CO	CO	CO
1860-A1	0.233	OPEN-HWY LEGAL	01-RES	01-RES	01-RES	01-RES
1863	4.732	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1863	0.331	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1863	0.460	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1863	0.007	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1863	0.786	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	01-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1863	0.699	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1863-A1	0.680	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1863-A1	0.649	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1863-B1	0.174	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1863-C1	0.276	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1863-E1	0.346	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1863-E1	0.410	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1863-F1	0.968	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1863-G1	0.085	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1863-G1	0.948	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1863-H1	0.262	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1864	1.410	01-RES	01-RES	01-RES	01-RES	01-RES
1864	1.804	01-RES	01-RES	01-RES	01-RES	01-RES
1864	1.329	01-RES	01-RES	01-RES	01-RES	01-RES
1864	0.256	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1864	0.102	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1864-A1	0.277	01-RES	01-RES	01-RES	01-RES	01-RES
1866	0.106	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1868	1.385	13-RES	MT 5/16-10/14	06-RES	06-RES	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1869	3.076	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1869-A1	0.374	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1869-B1	2.607	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1870	0.776	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1870	0.705	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1870	1.564	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1870	0.438	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1870	0.246	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1870	1.552	13-RES	05-RES	06-RES	05-RES	MT 5/16-8/31
1870	1.100	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1870	0.488	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1870	0.206	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1870	0.267	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1870-A1	0.972	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
1870-B1	0.424	01-RES	06-RES	06-RES	06-RES	06-RES
1870-C1	0.342	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1871	1.226	01-RES	06-RES	06-RES	06-RES	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1871	0.590	01-RES	MT 5/16-10/14	06-RES	06-RES	MT 5/16-8/31
1871	3.089	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1871	0.009	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
1871-001	0.807					MT NEW 5/16-8/31
1871-002	0.813	U OPEN-HWY LEGAL	MT 5/16-10/14	06-RES	06-RES	MT 5/16-8/31
1871-A1	1.394	01-RES	MT 5/16-10/14	06-RES	06-RES	MT 5/16-8/31
1871-A1	1.446	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1871-A2	0.735	01-RES	06-RES	06-RES	06-RES	MT 5/16-8/31
1871-A3	1.405	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1871-A3	0.489	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1871-A3	0.648	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1871-A3	0.816	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1871-A4	0.218	01-RES	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1871-A5	0.468	01-RES	06-RES	06-RES	06-RES	06-RES
1871-A6	0.090	01-RES	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
1871-B1	0.716	01-RES	06-RES	06-RES	06-RES	06-RES
1871-B2	0.301	01-RES	06-RES	06-RES	06-RES	06-RES
1871-C1	0.989	01-RES	06-RES	06-RES	06-RES	06-RES
1876	0.320	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1876	0.200	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876	0.621	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876	0.206	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876	0.434	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876	1.396	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876	0.810	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876	0.200	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876	0.672	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876	0.289	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876	0.510	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876	0.038	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876-A1	1.597	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NM
1876-A1	0.260	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876-A1	0.207	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1876-A1	0.216	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1876-B1	0.056	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1876-B1	0.957	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1876-B1	0.259	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876-B1	0.228	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876-B1	0.099	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876-B1	0.303	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876-B1	0.684	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1876-B1	0.850	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1876-B3	0.275	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876-B3	0.085	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1876-C1	0.273	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1876-C1	0.583	06-RES	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1876-D1	0.289	06-RES	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1876-E1	0.099	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
1876-E1	0.475	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1876-F1	0.080	06-RES	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1876-F1	0.007	06-RES	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1876-F1	0.170	06-RES	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
1880	0.229	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1880	0.289	01-RES	01-RES	01-RES	01-RES	01-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
1896	0.259	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
1897	0.524	OPEN-HWY LEGAL	01-RES	01-RES	01-RES	01-RES
1898	0.100	01-RES	01-RES	01-RES	01-RES	01-RES
218	6.759	CO	CO	CO	CO	CO
218-A1	0.129	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
218-A1	0.306	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
218-A2	0.394	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
218-A2	0.016	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
218-B1	0.167	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
227	3.959	CO	CO	CO	CO	CO
227	0.015	CO	CO	CO	CO	CO
227	1.148	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
227	0.691	CO	CO	CO	CO	CO
227	5.835	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
227	0.050	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
227	0.415	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
227	0.717	CO	CO	CO	CO	CO
227-A1	0.243	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
227-A2	0.467	01-RES	06-RES	06-RES	06-RES	06-RES
227-A2	1.796	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
227-A3	1.070	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
227-A4	1.037	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
227-B1	0.712	01-RES	06-RES	06-RES	06-RES	06-RES
227-B1	0.950	01-RES	06-RES	06-RES	06-RES	06-RES
227-C1	0.539	01-RES	06-RES	06-RES	06-RES	06-RES
227-C1	0.313	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
227-D1	0.100	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES	OPEN-HWY LEGAL	NOMTR
227-D1	0.296	OPEN-HWY LEGAL	01-RES	01-RES	OPEN-HWY LEGAL	NOMTR
227-E1	0.905	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES	01-RES	01-RES
256	1.663	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
299	4.761	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
299-001	0.033					01-RES
299-A1	0.651	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
299-A1	0.114	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
299-B1	1.355	01-RES	01-RES	01-RES	01-RES	01-RES
299-C1	0.468	01-RES	01-RES	01-RES	01-RES	01-RES
299-D1	0.577	01-RES	01-RES	01-RES	01-RES	01-RES
299-E1	0.427	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
299-F1	0.061	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
299-F1	1.636	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
299-F2	0.343	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
299-F3	0.371	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
299-H1	0.157	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
299-H1	0.364	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
299-H1	0.116	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
299-H1	0.883	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
299-I1	0.428	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
314	5.178	13-RES	05-RES	06-RES	05-RES	MT 5/16-8/31
314	17.881	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
314	0.425	CO	CO	CO	CO	CO
314-006	0.862	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES
314-A1	0.787	01-RES	OPEN-HWY LEGAL	06-RES	06-RES	06-RES
314-B1	1.511	01-RES	06-RES	06-RES	06-RES	06-RES
314-D1	0.607	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
314-E1	1.665	01-RES	OPEN-HWY LEGAL	06-RES	06-RES	MT 5/16-8/31
314-E1	1.680	01-RES	OPEN-HWY LEGAL	06-RES	06-RES	06-RES
314-E2	0.756	01-RES	06-RES	06-RES	06-RES	06-RES
314-F1	0.565	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
314-G1	1.187	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
314-G2	0.765	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
314-G3	0.515	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
314-H1	0.664	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
314-I1	0.908	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
314-I1	1.511	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
314-I2	0.397	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
314-J1	4.279	02-RES	OPEN-HWY LEGAL	06-RES	06-RES	06-RES
314-J3	3.321	02-RES	07-RES	06-RES	06-RES	06-RES
314-J3	1.623	06-RES	06-RES	06-RES	06-RES	06-RES
314-J5	0.485	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
314-K2	0.295	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
314-L1	0.610	01-RES	06-RES	06-RES	06-RES	06-RES
314-M1	0.152	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
314-M2	0.196	06-RES	01-RES	06-RES	06-RES	06-RES
328	1.278	NOMTR	NOMTR	NOMTR	NOMTR	NOMTR
329	7.725	NOMTR	NOMTR	NOMTR	NOMTR	NOMTR
335	0.164	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
335	1.357	CO	CO	CO	CO	CO
335	0.245	CO	CO	CO	CO	CO
335	0.260	OPEN-HWY	OPEN-HWY	OPEN-HWY	OPEN-HWY	OPEN-HWY

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
		LEGAL	LEGAL	LEGAL	LEGAL	LEGAL
335	0.488	CO	CO	CO	CO	CO
335	1.784	CO	CO	CO	CO	CO
335	3.845	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
335-A1	1.208	06-RES	07-RES	06-RES	07-RES	01-RES
335-A2	1.369	06-RES	07-RES	06-RES	07-RES	01-RES
335-B1	0.396	06-RES	06-RES	06-RES	06-RES	01-RES
335-B2	1.800	06-RES	06-RES	06-RES	06-RES	01-RES
337	56.094	M-08.01	M-08.01	M-08.01	M-08.01	M-08.01
348	2.643	NOMTR	NOMTR	NOMTR	NOMTR	NOMTR
359	2.856	NOMTR	NOMTR	NOMTR	NOMTR	NOMTR
359A	0.170					NOMTR
362	3.100	NOMTR	NOMTR	NOMTR	NOMTR	NOMTR
371	0.087	NOMTR	NOMTR	NOMTR	NOMTR	NM
375	1.931	NOMTR	NOMTR	NOMTR	NOMTR	NOMTR
4005	4.422	CO	CO	CO	CO	CO
4005	0.983	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4005	0.972	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4005	0.760	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4005	1.170	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT
4005-001	1.721	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES
4005-002	0.934	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
4005-003	0.607	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES
4005-004	0.071	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES
4005-005	0.724	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES
4005-006	0.309	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES
4005-007	0.028	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES
4005-008	0.330	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES
4005-A1	2.923	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4005-A1	2.802	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT
4005-A2	0.746	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT
4005-A3	2.074	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT
4005-A3	1.090	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4005-A4	0.754	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT
4005-A5	0.125	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4005-A6	0.261	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4005-A7	0.064	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4005-C1	0.714	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
4005-D1	0.043	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4005-D1	1.112	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4005-E1	0.862	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4005-E1	0.713	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
4005-E1	0.016	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4005-E2	0.640	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4006	0.274	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4006	0.280	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
4006	0.964	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4006	0.182	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT
4006	0.411	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT
4006	1.576	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	06-RES
4006	0.573	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4006-005	0.408	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4006-A1	0.670	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT
4006-A1	0.478	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4006-B1	1.052	OPEN-HWY	OPEN-HWY	OPEN-HWY	OPEN-HWY	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
		LEGAL	LEGAL	LEGAL	LEGAL	
4009-A1	1.348	01-RES	06-RES	06-RES	06-RES	MT 5/16-10/14
4009-B2	0.224	01-RES	06-RES	01-RES	01-RES	01-RES
4026	0.302	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES	06-RES
4026	0.446	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES	MT
4026	0.120	01-RES	06-RES	06-RES	06-RES	06-RES
4026-A2	0.526	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES	06-RES
4026-B1	1.214	01-RES	06-RES	06-RES	06-RES	06-RES
4036	0.563	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4036	1.875	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT 5/16-8/31
4036-A1	0.224	06-RES	06-RES	06-RES	06-RES	01-RES
4036-B1	0.218	06-RES	06-RES	06-RES	06-RES	06-RES
4037-E1	0.070	01-RES	01-RES	01-RES	01-RES	01-RES
4037-E1	0.268	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
4044	1.193	01-RES	06-RES	06-RES	06-RES	06-RES
4044	0.509	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
4044-B1	0.679	01-RES	06-RES	06-RES	06-RES	06-RES
4044-E1	1.700	01-RES	06-RES	06-RES	06-RES	01-RES
4045	0.701	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4045	1.488	01-RES	06-RES	06-RES	06-RES	06-RES
4045-A1	0.290	01-RES	06-RES	06-RES	06-RES	06-RES
4045-B1	0.482	01-RES	06-RES	06-RES	06-RES	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
4045-C1	0.379	01-RES	06-RES	06-RES	06-RES	06-RES
4045-D1	0.364	01-RES	06-RES	06-RES	06-RES	06-RES
4045-D2	0.539	01-RES	06-RES	06-RES	06-RES	06-RES
4046	0.443	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4100	2.401	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES	OPEN-HWY LEGAL	MT 5/16-8/31
4100-B1	0.494	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES	OPEN-HWY LEGAL	06-RES
4104	0.546	01-RES	06-RES	06-RES	06-RES	01-RES
4104	1.730	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4104-A1	2.203	06-RES	MT 5/16-10/14	06-RES	MT 5/16-10/14	MT 5/16-8/31
4104-A1	0.387	06-RES	06-RES	06-RES	06-RES	01-RES
4104-A2	0.386	06-RES	MT 5/16-10/14	06-RES	MT 5/16-10/14	MT 5/16-8/31
4104-A2	0.414	06-RES	06-RES	06-RES	06-RES	06-RES
4104-B1	0.227	06-RES	06-RES	06-RES	06-RES	01-RES
4164	0.455	06-RES	06-RES	06-RES	06-RES	06-RES
4177	1.220	01-RES	01-RES	01-RES	01-RES	01-RES
4180	0.467	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
4197	0.613	15-RES	03-RES	03-RES	03-RES	OPEN-HWY LEGAL
495	0.032	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
495	0.575	CO	CO	CO	CO	CO
495	0.296	CO	CO	CO	CO	CO
495	0.032	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
495	0.044	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
495	2.154	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
495	0.241	CO	CO	CO	CO	CO
495	6.651	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
495	1.085	CO	CO	CO	CO	CO
495-A1	0.742	06-RES	06-RES	06-RES	06-RES	06-RES
495-A3	0.131	06-RES	MT 5/16-10/14	06-RES	MT 5/16-10/14	MT 5/16-8/31
495-B1	0.520	06-RES	06-RES	06-RES	06-RES	06-RES
495-C1	0.133	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
495-C1	0.801	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
495-C2	0.419	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
495-C3	0.329	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
495-C3	0.379	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
495-C3	0.245	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
495-C3	0.293	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
495-C4	0.172	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
495-C4	0.190	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
495-C4	0.053	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
495-C4	0.063	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
495-D1	1.346	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
495-D1	0.780	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
495-F1	0.452	06-RES	06-RES	06-RES	06-RES	06-RES
495-F2	0.483	06-RES	06-RES	06-RES	06-RES	06-RES
495-F3	0.861	06-RES	06-RES	06-RES	06-RES	06-RES
495-G1	0.340	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
525		CO	CO	CO	CO	CO
525-A1	0.133	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
525-A1	1.335	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
525-A1	0.093	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
527	1.134	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
527	2.016	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
527	0.168	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
527	1.569	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
527	0.117	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
527	0.129	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
527	1.883	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
527-A1	0.341	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
527-A1	0.493	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
527-A1	0.782	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
527-A2	0.253	OPEN-HWY	OPEN-HWY	OPEN-HWY	OPEN-HWY	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
		LEGAL	LEGAL	LEGAL	LEGAL	
527-A2	0.372	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
527-B1	1.514	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	01-RES
527-C1	1.070	06-RES	06-RES	06-RES	06-RES	01-RES
571	2.551	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571	1.358	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571	3.200	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571	1.277	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571	0.365	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571	0.954	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571	0.800	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571	0.909	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571-001	0.453	U OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	NS-01-RES
571-A1	0.595	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571-A2	0.328	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
571-A3	0.232	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
571-A4	0.334	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
571-B1	0.426	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
571-C1	1.349	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571-D1	0.279	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571-E1	0.230	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
571-F1	0.262	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
578	0.424	01-RES	01-RES	01-RES	01-RES	01-RES
578	1.640			01-RES		
622	1.652	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
622	2.000	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
622	2.058	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
622	1.073	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
622-A1	0.440	01-RES	06-RES	06-RES	06-RES	06-RES
622-C1	0.618	01-RES	06-RES	06-RES	06-RES	06-RES
622-C2	0.383	01-RES	06-RES	06-RES	06-RES	06-RES
622-D1	0.732	01-RES	06-RES	06-RES	06-RES	06-RES
622-E1	0.371	01-RES	06-RES	06-RES	06-RES	06-RES
622-E2	0.115	01-RES	06-RES	06-RES	06-RES	06-RES
622-E3	0.113	01-RES	06-RES	06-RES	06-RES	06-RES
622-G1	0.417	01-RES	06-RES	06-RES	06-RES	06-RES
695	6.809	CO	CO	CO	CO	CO
695-012	0.050	U OPEN-HWY LEGAL	NS-01-RES	NS-01-RES	NS-01-RES	NS-01-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
695-015	0.102	U OPEN-HWY LEGAL	NS-01-RES	NS-01-RES	NS-01-RES	NS-01-RES
708	6.251	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
708	6.000	CO	CO	CO	CO	CO
708	1.772	CO	CO	CO	CO	CO
708-A1	0.309	01-RES	06-RES	06-RES	06-RES	MT
708-A1	1.120	01-RES	06-RES	06-RES	01-RES	MT
708-A2	0.383	01-RES	06-RES	06-RES	06-RES	06-RES
708-A3	0.089	01-RES	06-RES	06-RES	06-RES	06-RES
708-A4	0.133	01-RES	06-RES	06-RES	06-RES	06-RES
708-A4	0.182	01-RES	01-RES	01-RES	01-RES	06-RES
708-B1	0.612	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-B2	0.644	01-RES	06-RES	06-RES	06-RES	06-RES
708-B3	1.025	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-B4	0.113	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-C1	1.250	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-C2	1.387	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES	06-RES
708-C3	0.342	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES	06-RES
708-C4	0.140	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-C4	0.090	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES	06-RES
708-C5	0.343	OPEN-HWY	OPEN-HWY	OPEN-HWY	OPEN-HWY	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
		LEGAL	LEGAL	LEGAL	LEGAL	
708-C6	0.443	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-D1	0.500	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-D1	0.358	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-D2	0.357	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-D3	0.042	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-E1	1.475	OPEN-HWY LEGAL	06-RES	06-RES	06-RES	MT
708-E1	1.384	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	MT
708-E2	0.440	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-E3	0.385	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-E3	0.716	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-E4	0.278	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-E5	0.287	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-E6	0.267	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-E7	0.219	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-E8	0.326	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
708-E9	0.208	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-F1	0.588	01-RES	06-RES	06-RES	06-RES	06-RES
708-G1	2.356	01-RES	06-RES	06-RES	06-RES	06-RES
708-G1	0.258	01-RES	06-RES	06-RES	06-RES	OPEN-HWY LEGAL
708-H1	0.273	01-RES	06-RES	06-RES	06-RES	06-RES
708-H2	0.038	01-RES	06-RES	06-RES	06-RES	06-RES
708-I1	1.178	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
708-J1	0.245	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-J2	0.120	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
708-J3	0.325	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
709	5.738	CO	CO	CO	CO	CO
774	0.841	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
774	1.060	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
774	0.323	CO	CO	CO	CO	CO
774-A1	0.731	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
774-A1	0.314	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
774-A1	0.980	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
774-A1	0.387	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
774-B1	0.281	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL
774-B1	0.704	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	06-RES
774-B2	0.057	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	OPEN-HWY LEGAL	01-RES
843	0.426	CO	CO	CO	CO	CO
Clancy Creek Road	13.507	CO	CO	CO	CO	
Dry Gulch	3.435	CO	CO	CO	CO	
Marysville Road	6.992	CO	CO	CO	CO	CO
MTR-001	0.826	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-002	0.587	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-003	0.173	M-07	MT-01-RES	MT-01-RES	MT-01-RES	MT-01-RES
MTR-004	0.316	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-005	0.517	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-006	0.259	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-007	0.167	M-07	MT-01-RES	MT-01-RES	MT-01-RES	MT-01-RES
MTR-008	0.589	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-009	0.185	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-011	0.738	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-011	0.485	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-012	0.238	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-013	0.257	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-014	0.464	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-015	0.313	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-016	0.702	M-07	MT-01-RES	MT-01-RES	MT-01-RES	MT-01-RES
MTR-017	1.822	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
MTR-018	1.819	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-019	0.251	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-020	0.249	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-021	0.656	M-07	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-022	0.066	M-07	MT-01-RES	MT-01-RES	MT-01-RES	MT-01-RES
MTR-501	2.228	MT 5/16-10/14	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT 5/16-8/31
MTR-502	1.566	MT 5/16-10/14	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-503	2.661	MT 5/16-10/14	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES
MTR-504	0.981	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES	MT-01-RES
MTR-505	0.362	MT 5/16-10/14	MT-01-RES	MT-01-RES	MT-01-RES	MT-01-RES
PVT-202	0.416	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-203	0.577	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-204	0.058	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-205	0.064	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-206	0.253	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-207	0.356	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-208	0.501	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-209	0.531	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-210	0.474	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-211	0.053	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-212	0.708	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-213	0.457	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-214	0.205	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-215	0.462	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-216	0.516	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-217	1.164	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-218	0.385	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
PVT-219	1.624	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-220	0.321	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-221	0.405	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-222	0.061	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-223	0.539	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-224	0.107	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-225	0.635	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-226	0.364	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-227	0.292	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-228	0.719	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-229	1.156	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-230	2.106	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-231	0.447	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-232	0.938	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-233	0.295	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-234	0.248	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-235	0.244	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-236	1.647	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-237	0.205	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-238	0.494	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-239	0.448	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-240	0.158	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-241	0.893	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-242	0.275	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-243	0.089	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-244	0.030	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-245	0.228	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
PVT-246	0.156	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-247	2.078	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-248	0.399	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-249	0.086	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-250	0.115	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-251	0.253	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-252	0.392	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-253	0.251	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-254	0.197	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-255	0.337	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-256	0.797	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-257	0.424	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-258	0.298	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-259	3.545	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-260	0.888	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-261	0.041	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-262	0.650	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-263	0.381	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-264	0.202	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-265	0.316	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-266	0.187	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-267	0.420	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-268	0.135	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-269	0.163	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-270	0.136	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-271	0.454	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-272	1.226	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
PVT-273	0.622	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-274	0.593	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-275	1.140	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-276	0.416	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-277	0.556	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-278	0.423	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-279	0.106	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-280	0.592	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-281	0.100	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-282	1.107	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-283	0.206	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-284	0.222	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-285	0.390	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-286	0.357	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-287	0.271	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-288	0.313	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-289	0.533	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-290	0.279	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-291	0.347	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-292	0.216	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-293	0.357	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-294	0.128	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-295	0.402	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-296	0.685	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-297	0.556	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-298	0.359	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-299	0.051	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
PVT-300	0.502	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-301	0.119	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-302	0.042	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-303	0.109	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-304	0.289	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-305	0.114	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-306	0.078	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-307	0.753	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-308	0.831	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-309	0.511	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-310	0.328	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-311	1.003	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-312	0.925	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-313	2.077	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-314	0.590	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-315	1.239	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-316	0.308	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-317	0.122	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-318	0.294	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-319	0.382	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-320	0.273	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-321	0.302	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-322	1.238	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-323	1.052	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-324	0.644	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-325	0.252	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-326	0.000	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
PVT-327	0.154	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-328	0.098	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-329	0.735	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-330	0.965	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-331	0.154	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-332	0.206	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-333	0.340	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-334	0.516	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-335	1.267	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-336	0.227	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-337	0.909	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-338	0.215	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-339	0.503	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-340	0.101	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-341	0.121	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-342	0.194	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-343	0.687	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-344	0.229	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-345	0.521	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-346	0.333	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-347	0.326	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-348	0.385	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-349	0.891	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-350	0.485	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-351	0.233	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-352	0.169	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-353	1.031	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT

Route ID	Length (miles)	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4	ALTERNATIVE 5
PVT-354	0.257	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-355	0.153	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-356	0.075	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
PVT-364	0.255	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT	OPEN-PVT
U-200	1.163	U OPEN-HWY LEGAL	NS-01-RES	NS-01-RES	NS-01-RES	CDNST
U-201	0.346	U OPEN-HWY LEGAL	NS-01-RES	NS-01-RES	NS-01-RES	NS-01-RES
U-202	0.596	U OPEN-HWY LEGAL	NS-01-RES	NS-01-RES	NS-01-RES	NS-01-RES
U-203	0.938	U OPEN-HWY LEGAL	NS-01-RES	NS-01-RES	NS-01-RES	NS-01-RES
U-204	0.497	U OPEN-HWY LEGAL	NS-01-RES	NS-01-RES	NS-01-RES	NS-01-RES
U-205	0.992	U OPEN-HWY LEGAL	NS-01-RES	NS-01-RES	NS-01-RES	NS-01-RES

Appendix F. Response to Comments on Alternative 5 and the Updated Programmatic Forest Plan Amendment.

In response to comments on the North Divide Travel Plan Draft Environmental Impact Statement (DEIS) and field reviews, the Helena National Forest developed an alternative 5. This alternative is designed to increase motorized loop trail opportunities and reduce short spur and redundant parallel routes. It also improves big game security as well as addresses resource concerns relative to erosion and sedimentation from roads and stream crossings. Consideration was given to further align the Continental Divide National Scenic Trail (CDNST) with national standards.

The selection of this alternative would result in the production of a Motor Vehicle Use Map which would identify motorized routes that are open for use along with corresponding restrictions and designations. In addition, this map would show restrictions regarding dispersed camping. Use of a motor vehicle other than in accordance with specific designations would be prohibited. The authority for this action comes from 36 CFR 212 and 36 CFR 261.13.

In September of 2014, the Helena National Forest released the draft alternative 5 and an updated proposed wildlife programmatic plan amendment for public review and an additional 7 day comment period. Approximately 90 comments were received and were considered during analysis and used to inform this Final Environmental Impact Statement (FEIS) and the Draft Record of Decision (ROD). These comments will be considered when making the decision on the Divide Travel Plan.

Comments received during the comment period for alternative 5 ranged from being supportive of the proposal and other comments express concerns. The following provides a summary of identified issues derived from comments along with associated examples of quotes taken from comment letters. Also shown below is how the issues were carried forward and addressed in the FEIS. These are organized by the different components proposed under alternative 5.

Process

Proposal Description: In response to comment on the North Divide Travel Plan Draft Environmental Impact Statement the Helena National Forest Developed an Alternative 5.

Issue Summary: Comments indicated an appreciation for an alternative developed in response to comments received on the DEIS as well as some questions and concerns on how an alternative could be developed at this phase in the planning process without public meetings.

"Injecting Alternative 5 into the conversation after the comment period and without the benefit of public meetings is dishonest!" (G. Marble).

"I am writing to thank you for the Helena Ranger District's positive responsiveness to comments submitted on the Divide Travel Plan Draft Environmental Impact Statement. The recently released Alternative 5 represents a major improvement over the previously considered

alternatives. The new Alternative 5 goes a long way in addressing my concerns voiced earlier pertaining to: 1) management of the Continental Divide National Scenic Trail and adjacent wild lands (including the Nevada Mountain Roadless Area), 2) travel management of the Sweeny Creek area, 3) planning area-wide big game security needs, 4) sedimentation and erosion problems associated with forest roads and stream crossings, 5) motorized access to dispersed campsites and parking adjacent to designated motor routes, and 6) site-specific comments pertaining to individual roads and trails." (Gary Ingman).

Issue Resolution: Forest Service regulations do not limit the amount of public participation opportunities. The Forest Service requested public comments during project scoping and again during the 45-day comment periods on DEISs (40 CFR 1506.10). Additional comment periods or extending time past 45-day comment periods can occur when new project information emerges. In the case of the Divide Travel Plan DEIS, comments received during the 45-day comment period indicated that the original four alternatives left unresolved issues between motorized and non-motorized forest users as well as the proposed forest plan amendments. Consequently, the Helena National Forest found it appropriate to develop alternative 5 in order to better strike a balance between forest users and update the proposed forest plan amendment with potentially more effective elk security measures. In September of 2014, the Forest presented alternative 5 and provided the public with an opportunity to provide comments. The Forest also held numerous phone conversations and meetings with individuals and groups as requested to discuss alternative 5.

Handicap and Senior Citizen Motorized Access Needs

Proposal Description: Comments that expressed concerns about access for handicap and senior citizens generally pertain to overall travel management proposals in alternative 5. There were no travel management proposals made for the purpose of enhancing or decreasing opportunities for handicap and senior citizens.

Issue Summary: Comments sought additional and in some cases unlimited access for senior citizens and disabled individuals

"Access to HNF is needed for a growing aging population who cannot afford specialized vehicles to access their national forest. This includes elderly and persons with disabilities."

Issue Resolution: The purpose of the Divide Travel Plan is to determine a manageable system of designated public motorized access routes and areas within the Divide area. Determining motorized access for a specific group or population is not within the scope of this planning effort. The Helena National Forest recognizes the need for access to public lands for people with disabilities and of all ages. The Forest strives in our proposed alternatives to provide ample recreational opportunities for all while balancing the needs for resource protection. In all alternatives, motorized opportunities are provided and within these, motorized routes aimed at varying abilities and skill levels are provided.

Inventoried Roadless Areas (IRA)

Proposal Description: The Divide Travel Plan proposes various travel management decision within four IRAs. The decisions range from maintaining the exiting travel management status on routes, seasonally restricting routes, and yearlong closures to wheeled motorized use on routes.

Issue Statement Summary: Comments were received praising the additional wheeled closures in IRA, seeking additional closures, and seeking fewer closures.

Of particular interest is NFSR MTR501. There were comments requesting that this route remain open beyond the 9/1 date, even yearlong, to provide a connector between the Little Blackfoot and Spotted Dog and offer trail riding opportunity in this area later in the season. Comments also suggested the 9/1 closure was a step in the right direction but requested an additional spring snowmobile closure to protect big game winter range and calving.

"While not perfect, we endorse Alternative 5 for the following reasons... Eliminates most motorized routes in Inventoried Roadless Areas. We do however request consideration of leaving open as summer motorized MTR -501 in the Limburger Spring area as it dissects an important roadless area and important elk habitat." (Backcountry Hunters and Anglers).

"Limburger Springs – this area is much improved through Alternative 5 in that many dead-end roads would be closed. However more could be done to remove motorized use from calving/fawning areas by retaining the over-snow closure that exists in Alternative 1, and at least seasonally closing MTR-501 in the spring." (Gayle Joslin).

"… connectivity between the Black Mountain and Jericho IRA and the Electric Peak IRA is essential for wildlife movement, yet there are few proposed changes in that area that would improve connectivity by reducing motorized routes. We recommend expanding the OSV area restriction to include the entire Jericho Mountain IRA – route 1863 should be closed at its junction with route 527 (Minnehaha Creek Road). Additionally, MTR-501 between Limburger Springs and the Little Blackfoot cuts through the Electric Peak IRA and should be closed to motorized use yearlong. We encourage the expansion of OSV area restriction of the Electric Peak IRA and Nevada Mountain IRA to include all the inventoried roadless acreage. Roadless areas are invaluable to wildlife and should be managed at their maximum acreage as roadless and non-motorized." (Defenders of Wildlife).

Issue Resolution: Under alternative 5, MTR-501 would be open to wheeled motorized use on a seasonal basis (5/16 to 8/31) and over-snow motorized vehicles 12/2 to 5/15. Also under alternatives 3 and 4, this route is proposed to be closed year round to motorized use. Therefore, alternatives 3, 4, and 5 all consider restricting motorized use to varying levels during the spring and will be consider during the decisions for the travel plan. Only a limited amount of existing wheeled motorized routes were considered to remain open in the IRAs. Seasonal closures for

wildlife are considered and balanced with recreation opportunities. The decision for Divide Travel Plan will consider these requests to adjust the closure seasons on particular routes, weighing recreation and wildlife habitat concerns brought forward in comments.

Seasonal Trail (route) Dates

Proposal Description: All motorized trails with seasonal use open to wheeled motorized vehicles 50" and less in width would be open from 5/16 to 8/31 with the exception of the Lava Mountain connector trail # 4009-A1 which would be open from 5/16 to 10/14. There are approximately 14.5 miles of motorized trails that would have no seasonal restrictions.

Issue Statement Summary: Some comments received expressed concern about wheeled motorized travel routes being seasonally closed between 9/1 to 5/15 and over-snow routes being closed 12/2 to 5/15. While some comment expressed appreciation for the seasonal restriction others express concern that access would be limited under this proposal.

"We would support a 9/1 closure date in order to keep these very important routes open for motorized use. This is a reasonable compromise that should be considered." (Capital Trail Vehicle Association).

"We applaud recognition of the actual big game hunting season dates of 9/1 - 12/1". (Helena Hunters & Anglers Association).

"Alternative Plan #5 leaves approximately 2 months in fall without any motor vehicle access beyond 8/31. The only travel left is by mountain bike or horseback until snowmobile use. August 31st closure on motor vehicles doesn't allow for firewood gathering, hunting, or sightseeing. Plan is not age friendly." (Gene Grandy).

"Closure date of August 31st is unreasonable. This is way too early in the year as the public enjoys getting out at the end of summer and in the fall. The scenery and colors are beautiful and to be enjoyed by all. If a closure date of a trail has to be made, it should be a later time or at lease keep the same dates of October 15, 2014." (J. Daugaard).

Issue Resolution: The Helena National Forest Plan requires that we manage for big game security. The primary reason for these closure dates is to be consistent with Forest Plan standards for big game security, winter range, and calving.

Previous travel management route closures designed to protect big game species during the hunting season covered the time period from October 15 to December 1 (big game riffle season). Following recommendations by Montana Fish Wildlife and Parks, the Programmatic Amendment for Elk Security and the security analysis described in the wildlife section of chapter 3, apply an expanded definition of the hunting season to include both the general rifle season and the earlier archery season – a period extending from September 1 to December 1. In order to be considered bona fide hunting season closures, routes must now be closed to motorized use throughout this entire period.

Primary roads, throughout the Divide landscape are open yearlong with no seasonal restrictions under all alternatives. Many of the motorized trails would close 9/1 however they would still be accessible for non-motorized use. Licensed drivers can also operate 50 inch and less in width street legal vehicles on Forest Service Roads that are open later in the fall. There are also motorized trails open later into the fall, providing opportunity for late season riding, in Divide and other travel plan areas on the Helena National Forest.

Sweeny Creek Area

Proposal Description: With the exception of the Priest Pass Road, all routes in the Sweeny Creek area would be closed yearlong to motorized use including over-snow vehicles.

Issue Statement Summary: Comments received primarily supported closing Sweeny Creek to motorized use however there were some that requested it remain open and additional motorized opportunities sought in the Divide area. There were requests for additional 50" and less in width trails, loop, connector routes, family and youth opportunities as well as a few single track requests. Requests were also received for motorized routes accessing historic and cultural sites.

"We are very pleased to see that Alternative 5 proposes to consolidate the lands on both sides of MacDonald Pass into a large year-round non-motorized block. This would protect a large area for non-motorized winter recreation and create a quiet, non-motorized corridor for the Continental Divide National Scenic Trail. As many of our members enjoy skiing and snowshoeing on the CDNST we support designating this section of the trail and the surrounding area as non-motorized. In addition, designating the Sweeny Creek area as non- motorized in the winter provides opportunities for skiers to venture beyond the MacDonald Pass Cross-Country Ski Area to discover untracked snow in a quiet landscape." (Winter Wildland Alliance).

"Many important routes and connectors that provide a meaningful OHV experience have been left out of Alternative 5. This alternative would not provide a satisfying experience for the public as there is not enough miles, loops and destinations. The motorized closures are excessive. The public will not follow the travel plan if it does not reasonably meet their needs. Routes that need to be added to produce a reasonable alternative include… All existing motorized sections of the CDNST.." (Capital Trail Vehicle Association).

"Another concern of mine is the loss of Sweeny Creek. That was one of my favorite places to ride!" (Ashton Loomis).

"I am disappointed on the decision to completely close the Sweeny Cr. Recreation area. Total closure is not a compromise." (Jody Loomis).

"The Sweeny Creek area is important big-game winter range. Designating this area as non-motorized year-round would result in a substantial block of un-fragmented habitat for big game and other wildlife species. This area would provide the largest block of secure habitat on public land east of the Continental Divide and north of Highway 12 within the project area." (MT Fish Wildlife & Parks).

"Sweeny Creek has been abused for years by unmanaged recreation and illegal motorized abuse. This is critical wildlife habitat and needs to be protected." (Diane Tipton).

Issue Resolution: The existing condition of the Divide landscape has approximately 20 miles of 50" or less in width motorized trail. Alternative 5 is proposes up to 60 miles of motorized trail 50" or less in width. Opportunities were sought in alternative 5 to open connecting routes and increase loop opportunities. Many of these motorized trails are suitable for youth and family riding and do not require riders to be licensed. Many of the roads and motorized trails in the Divide area access historic mining sites and other culturally significant areas. The trails south of Elliston are particularly suitable for a scenic ride that travels past numerous historic mine sites. Future interpretation along these trails may be developed if there is interest from the public to do so.

Sweeny Creek is proposed to be closed to motorized use in alternative 5 because of its high value as wildlife habitat and limited opportunity for motorized use.

Over-snow motorized use in the Nevada Mountain Area and east slope of Continental Divide adjacent to.

Proposal Description: Expand Divide planning area to include the area on the east slope of the Continental Divide adjacent to the Nevada Mountain Inventoried Roadless. Restrict over-snow use in the Nevada Mountain area as it is shown in alternative 3.

Issue Statement Summary: Comments received on alternative 5 expressed an interest in expanding the Divide planning area to include the area on the east slope of the Continental Divide adjacent to the Nevada Mountain Inventoried Roadless. Additional comments also requested to restrict over-snow motorized travel in the Nevada Mountain area.

"Although the east side of the Nevada Mountain Roadless Area (upper Little Prickly Pear Creek) is not included in this decision, it was originally part of the Divide landscape before it was split off for the Soundwood decision, so the east face of Nevada Mountain Roadless Area should eventually receive winter travel management that would be consistent with the adjoining Blackfoot winter travel plan to the west, and Alternative 5 of the Divide travel plan." (Helena Hunters and Anglers Association & Clancy-Unionville Citizens Task Force).

"Also important to us is keeping the Nevada Mountain wild area, Little Blackfoot headwaters and Continental Divide National Scenic Trail motor-free. We use these areas for quite recreation--hiking, XC skiing and wildlife viewing." (Wendy & Gregg Wheeler).

Issue Resolution: Travel management for this area was included in the Soundwood decision which did not include winter travel management decisions for over-snow motorized travel. Including a winter travel management decision for this area would be out of the scope of the decisions to be made under the Divide Travel Plan because the area is outside the Divide Travel Plan project area boundary.

The Divide Travel Plan area provides a valuable over-snow motorized opportunity for the Helena community. The snow conditions are generally very good and it has relatively easy access for all levels of rider. Alternative 5 closes nearly all of the Inventoried Roadless in this area to over-

snow use. It does leave a small portion open that is in a heavy use and popular area to snowmobilers. Alternative 5 also removed the closure on the ½ sections running along the west side of the Divide planning area, outside the roadless. Users enter the Divide area from the west, along private property and enforcing these ½ section closures would be difficult. The perimeter delineation of the over snow closure in alternative 5 will be identifiable on the MVUMs.

Additional over-snow closures were put in place in alternative 5 along the Continental Divide in Sweeny Creek, Mac Pass, Priest Pass, Jericho and Bison Mountain for wildlife and quiet recreation considerations.

Continental Divide National Scenic Trail (CDNST)

Proposal Description: NFSR #136-D1 would be closed to wheeled motorized vehicles yearlong. Approximately, one mile of the CDNST trail located north of NFSR #136, and just south and east of Meyers Hill, would be rerouted and designated as a non-motorized section of the CDNST. Refer to the CDNST map for information on motorized and non-motorized segments of the CDNST.

Issue Statement Summary: Primarily, comments supported moving the CDNST in the Divide area closer to the National Standard by reducing motorized use. There were some requests to not restrict motorized use on the CDNST. There was a request to close the microwave tower FSR 1802 yearlong.

"Many important routes and connectors that provide a meaningful OHV experience have been left out of Alternative 5. This alternative would not provide a satisfying experience for the public as there is not enough miles, loops and destinations. The motorized closures are excessive. The public will not follow the travel plan if it does not reasonably meet their needs. Routes that need to be added to produce a reasonable alternative include… All existing motorized sections of the CDNST.." (Capital Trail Vehicle Association).

"MFWP supports the Helena Ranger District's proposal to restrict motorized use year round at MacDonald Pass under both Alternatives 3 and 4, closing route 1802 and designating the area as closed to snowmobile use." (Montana Fish, Wildlife, & Parks).

"Road 1802. Have you considered limiting to authorized users (administrative and facility maintenance) motorized vehicle access north of MacDonald Pass to the radio facilities? … In general, we are pleased by the direction to manage substantial sections of the CDNST for non-motorized use. Thank you for inviting our comments." (Continental Divide Trail Society).

Issue Resolution: Road 1802 provides access to the microwave tower and numerous emergency service communication facilities. The facilities are frequently maintained and improved with advances in technology. This route also provides the public with opportunities for berry picking, firewood gathering and a scenic route in the fall.

Alternative 5 restricts motorized use along the CDNST when adjacent motorized routes are available in the vicinity for the purpose of reducing conflict with non-motorized trail users on the CDNST.

Parking, Access to Dispersed Campsites up to 70' from a designated route, & Access to Dispersed Campsites further than 70' from a designated route

Proposal Description:

Parking would be limited up to 30 feet from the edge of a designated route.

Parking and motor vehicle use associated with dispersed camping would be limited to no more than 70 feet from the edge of a designated route as long as:

1. No new permanent routes are created by this activity
2. No damage to existing vegetation, soil, or water resources i.e., damage to live trees and shrubs, rutting, and eroding of stream banks or bare soil.
3. Travel off-route does not cross streams
4. Travel off-route does not traverse riparian or wet areas
5. Vehicles travel to and parking associated with dispersed campsites would be limited to no closer than 30 feet of a stream or body of live water.

Dispersed campsites located more than 70 feet from the edge of a designated route that are identified on the alternative 5 map would remain open for dispersed camping and parking associated with dispersed camping. The five items identified under the access to dispersed campsites up to 70' from a designated route section are applicable for this as well.

Issue Statement Summary: Comments were received both supporting and discouraging a 70 foot limit to off route travel for dispersed camping. Some comments felt this was a good start but could be hard to enforce and maintain over time. Others felt 70 feet wouldn't be safe or enjoyable and more room was needed.

"The previous rule that has allowed driving 300 feet off of roads for camping, has resulted in resource damage (mud bogging, riparian zone damage, erosion, weed spread, fish and wildlife habitat deterioration) along roads throughout the Helena National Forest. Alternative 5 would be a huge improvement over the existing rule for the Divide Landscape in that it would reduce the area of impact to 30 feet for vehicle parking, and to 70 feet if a camping trailer is involved." (Helena Hunters and Anglers Association & Clancy-Unionville Citizens Task Force).

"It is assumed that those Established Dispersed campsites that occur more than 70' from a road will all be individually signed. If any of these existing dispersed campsites are damaging streams or riparian zones, they should be closed and rehabilitated." (Gayle Joslin).

"The 70 foot from road restriction for camp sites. Who wants to camp that close to road? As I mentioned earlier, Montana still has freedom and I don't want to lose what we have left. Going camping means getting away, quiet setting, and no dust, place to set dogs and kids loose. The 300 foot from road is reasonable and safer and makes more sense." (J. Daugaard).

"The 70 foot from road restriction for camp sites does not adequately consider that campers do not want to camp "right on the road". Campers subjected to this restriction would expose kids and dogs to a significant safety hazard from traffic on the forest roads. We are extremely concerned about the creation of a public safety issue when we have adequate room in the forest to accommodate a more reasonable rule. Additionally, camping in the dust and noise would make for a far less rewarding experience… A restriction to 70 feet just does not make good sense." (Capital Trail Vehicle Association).

Issue Resolution: Numerous historic dispersed campsites have been identified on the alternative 5 map where camping greater than 70 feet from a designated route would be authorized. These sites are in addition to the parking authorized up to 70 feet from a designated route for dispersed camping. There are also several campgrounds available in the Divide area.

Updated Programmatic Amendment

Proposal Description:

This programmatic Forest Plan amendment for the Divide Travel Plan project area is needed to more closely align current science, local conditions, and other information with the needs of big game, particularly elk, which meet the intent of the Forest Plan. The amendment considers the impacts of open motorized routes on elk security, establishes blocks of secure habitat, and can be measured regardless of changes in hiding cover. While the proposed amendment decouples hiding cover from security during the hunting season, several Forest-wide and Management Area standards remain in place that govern management of hiding cover.

The assumptions built into the existing (1986) Forestwide Standard 4a (hereafter Standard 4a) have not proven useful in gauging or guiding management activities under the Forest Plan. Actual elk populations and trends as monitored over the last twenty nine years simply do not correlate with this existing standard or its assumptions. Elk numbers have consistently increased during this time period and the existing standard needs to be revised to address recent elk management challenges.

Alternative B was designed to address best science and local knowledge. It also expanded consideration to all open motorized routes (whereas Alternative A technically only applies to roads as originally envisioned in the Forest Plan). Alternative B would replace the existing Forest Plan Standard 4a.

Under the Forest Plan amendment proposed as part of the Divide Travel Plan—and applicable to future projects in the Divide landscape —the "security area" approach replaces the "road density/hiding cover index" as the Forest Plan standard for gauging the vulnerability of elk to

hunting. The amendment derives from the "Hillis Paradigm" (1991) and adopts specific guidelines for its application from the U.S. Forest Service and Montana Department of Fish, Wildlife, and Parks Collaborative Recommendations for Big Game Habitat Management on the Custer, Gallatin, Helena, and Lewis and Clark National Forests (MFWP and USDA Forest Service 2013).

The proposed amendment would establish security and intermittent refuge area thresholds as the numeric standard to replace existing Standard 4a. Security would be defined as "a proportion of an elk herd unit within the administrative boundary of the Helena Ranger District that consists of an area of at least 1000 acres in size that is at least ½ mile from a motorized route open to the public between 9/1 and 12/1…". Intermittent refuge areas would be defined as "those areas at least 250 acres in size and less than 1000 acres in size that are greater than or equal to ½ mile from a motorized route open to the public between 9/1 and 12/1...". Temporary reductions would be allowed in security blocks and intermittent refuge areas providing impacts to elk and elk habitat are mitigated at the project level. The proposed amendment also includes a cover guideline to ensure cover is considered in project level planning and analysis. A goal is also included to increase security when opportunities arise.

Issue Summary:

Several public comments received during the additional comment period for the updated programmatic Big Game amendment included the following (Issue summary statements correlate numerically with the subsequent issue resolution section:

1. There was a concern about allowing temporary reductions in security blocks and intermittent refuge areas without specific mitigation requirements;

"But we note that "security" as defined is not secure in that all manner of "administrative activity" (which compromises security) would be allowed with unspecified "mitigation" that "may include" certain actions, but there are actually no specific mitigation requirements." (Helena Hunters and Anglers Assoc. / Clancy-Unionville Citizens Task Force).

2. The existing 1986 Forest Plan standard for big game security is actually a better standard than the one being proposed and that there were no alternatives demonstrating consistency with the existing Standard 4a;

"We believe that the existing 1986 Forest Plan Standard for big game security is actually a better STANDARD than the amendment being proposed because unlike the amendment it is actually measurable – as a standard should be." (Alliance for the Wild Rockies).

3. There is no scientific basis for the proposed amendment;

No scientific basis for the proposed amendment is provided." (Helena Hunters and Anglers Assoc. / Clancy-Unionville Citizens Task Force).

4. A cover requirement should be part of the proposed amendment standard (not just a guideline);

"The claim that the security direction is a standard is also a NEPA violation, in addition to the lack of any motorized route limitations, or hiding cover requirements, or that security only has to be provided "over the long term," is further eroded, if that is even possible, by the claim that security levels identified for each EHU do not actually have to be met as long as there is some "mitigation." Almost anything could be identified as mitigation (as was noted in the list of possible mitigation), allowing short-term reductions of security. The agency does not provide any actual information to the public that "mitigation" will ensure that elk security levels as per the amendment definition, will be maintained. This is just another meaningless loophole that makes this amendment totally bogus." (Native Ecosystems Council).

5. It appears that the proposed amendment is applicable to the entire Helena Ranger District which includes portions of the Elkhorns and Big Belts;

"We have been of the understanding that the proposed big game security amendment was applicable only to the Divide Travel Plan. Upon studying the definition of the amendment more closely, the amendment would apply to the entire Helena Ranger District…" (Helena Hunters and Anglers).

6. The proposed amendment does not meet the definition of a standard as having features that are measurable and able to indicate trends;

"Neither the Blackfoot nor Divide big game security amendments actually meet the definition of a standard as having features that are measurable and able to indicate trends." (Helena Hunters and Anglers Association / Clancy-Unionville Citizens Task Force).

7. The proposed amendment should be addressed under Forest Plan Revision, not the Divide Travel Planning process;

"The big game security amendment should be addressed under Forest Plan Revision, and not held hostage to the Travel Plan process. But because it has been, in order to realize a reasonable Travel Plan for the Divide area, we have cautiously supported the big game security amendment for the Divide Travel Plan area only." (Helena Hunters and Anglers Assoc. / Clancy-Unionville Citizens Task Force).

8. There was concern about how the proposed amendment would address cover requirements for other species (grizzly, lynx, marten, goshawks);

"We are left with more questions than answers about the big game security amendment and fear that it does not meet existing Forest Service regulations, and worse, it will not meet the needs of big game (other big game as well as elk), and it may in fact complicate management for other species such as lynx, grizzly bear, and various species of sensitive birds and smaller mammals such as marten and wolverine." (Helena Hunters and Anglers Assoc. / Clancy-Unionville Citizens Task Force).

9. There was a concern that the 40% canopy cover definition used to map hiding cover was not based on science.

"The definition of 40% canopy cover as hiding cover is not based on any science. The agency's white paper by Canfield (2011) is not science. It has not been peer reviewed, or provided to the public for review. As such, it is not appropriate to insert it in this Forest Plan amendment. The two sources cited for this definition are Lonner and Cada (1982) and Canfield (2011). The former has no data as to how this determination was made, and is therefore not valid science. The latter is not a Forest Service research paper, nor has it had any public or peer review. It is just the Forest Service creating their own science, which is a NEPA violation." (Native Ecosystems Council).

Issue Resolution:

1. The proposed amendment describes mitigation including examples as follows: Mitigation is defined as design elements and/or constraints applied to project level activities that reduce project impacts on elk or elk security. Mitigation measures may include but are not limited to one or more of the following: timing restrictions of activities in security blocks, confining activities to one security block at a time, completing as much of the preparatory work as possible prior to the hunting season, reducing the size/acres/intensity/magnitude of the activity, allowing activities that benefit elk (particularly in management areas with a wildlife emphasis), limiting activities to one season, temporarily closing roads open to the public to compensate for the activity, etc. Specific mitigation measures are not built into the definition in order to allow mitigation measures to be tied to a specific project. The proposed amendment also discusses the existing Forest Plan standards that will remain in place; these standards do provide specific direction that would be applied to future projects.
2. The proposed amendment includes a discussion of the challenges associated with the existing Standard 4a (See the Background Section of the amendment). Several public comments received during scoping and during the comment period for the DEIS included the request that a travel plan alternative be developed to meet Standard 4a (Big Game Security). An analysis was completed to determine if the Forest had management discretion to close enough Forest System roads to achieve compliance with Standard 4a in the elk herd units (EHU) in the Divide Travel Plan project area. That analysis indicated that the Forest did have the jurisdiction to close several miles of open roads during the hunting season to achieve consistency with Standard 4a in 5 out of 6 herd units. However, for one of those five herd units – Quartz Creek – travel planning has already been completed in a majority of that herd unit; so there is limited opportunity to close additional roads during the hunting season. The Greenhorn EHU would remain out of compliance with Standard 4a because the Forest simply does not have sufficient road closure discretion. Meanwhile, Alternative 5 - modified includes sufficient closures during the hunting season such that 4 out of the 6 herd units achieve compliance with Standard 4a. The two herd units that remain out of compliance are Quartz Creek and Greenhorn.
3. Information used for the Forest Plan amendment is based on best science and direct knowledge of species use in the project area (See Big Game Amendment, Section Alternative Description/Alternative B/Discussion and the wildlife analyses in Chapter 3).

4. The proposed amendment describes why the existing hiding cover/open road density metric may no longer be practicable in its application (See Comparison of Alternatives, Alternative A, Discussion). The proposed amendment also describes the basis for the cover guideline: "The cover guidelines, along with remaining hiding cover standards, should ensure that cover is provided as part of future management activities. The guidelines also provide flexibility to promote forest regeneration to offset cover losses associated with the mountain pine beetle epidemic. Although a majority of security and intermittent refuge areas currently contain hiding cover, this condition is expected to change over the next several years as trees killed by the mountain pine beetle fall (Keen 1955, Mitchell and Preisler 1998, Lewis and Hartley 2006, Page and Jenkins 2007, Klutsch et al. 2009). How these changes affect elk populations and distribution are uncertain; down trees may impede elk movement (Saab et al. 2014) while overstory mortaility could improve forage opportunities (Stone 1995). Currently, a study is ongoing in the Elkhorn Mountains on the Forest to address this very topic. These data could be extrapolated Forestwide in similar forested conditions and used to influence management."
5. The proposed amendment applies only to "the National Forest System lands within those portions of the following elk herd units that are within the Helena Ranger District, Helena National Forest administrative boundary – Black Mountain-Brooklyn Bridge, Greenhorn, Jericho, Little Prickly Pear-Ophir, Quartz Creek, and Spotted Dog-Little Blackfoot". This does not include the Elkhorns or Big Belts.
6. The proposed amendment includes numeric values for the percent of security and intermittent refuge areas within each elk herd unit (as described above in #5). It also discusses that the existing Forest Plan monitoring components would still be applicable for the proposed amendment (See the Monitoring section).
7. The HNF has recently initiated Forest Plan Revision and anticipates the process taking at least up to four years. Because we are required to finalize our travel planning efforts, we are proposing to amend Standard 4(a) now which, upon subsequent revision, could remain in place.
8. The proposed amendment identifies the remaining Forest Plan standards that govern cover management including existing Big Game standards and the Northern Rockies Lynx Management Direction (See. Compatibility of Forest Plan Amendment Alternative B-Preferred Alternative with Existing Wildlife Standards).
9. The proposed amended includes a section that describes the hiding cover methodology used for the amendment (and the FEIS). See the Hiding Cover Methodology section.

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