

REC'D LCNF OCT 2 0 2006

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Montana Fish, Wildlife & Parks

4600 Giant Springs Road
Great Falls, MT 59405

Lesley Thompson
Forest Supervisor
Lewis & Clark National Forest
1101 15th Street N.
Great Falls, MT 59401

RE: L&C National Forest Travel Plan Comments

Dear Mr. Thompson:

Review of, and corresponding Fish, Wildlife & Parks' (FWP) comments regarding the proposed Lewis & Clark National Forest Travel Management Plan as outlined in your Draft EIS, July 2006 are incorporated in the pages attached. Comments are segregated into four parts; General Comment, Wildlife, Fisheries, and Parks recommendations. Fish, Wildlife & Parks would like to thank you and the USFS for the opportunity given to the public and FWP to assist in the development of the USFS plans to manage use on the Lewis and Clark National Forest. The ability for user groups to access federal lands can have significant impacts to wildlife, fisheries, parks, social interactions, and natural environment over this large geographic area.

Based on FWP's review of the proposed "Summer Alternatives 1, 3, 4, and 5 and Winter Alternatives 1 - 3" there is no one proposed "Alternative" that FWP can fully endorse. Therefore FWP's comments will center on specific open travel routes, mode of travel, and what FWP feels is appropriate for social & resource management. There are several concerns that form a basis for FWP's comments including: appropriate access to public lands for all user groups; increasing presence of OHV most notably ATV's; wildlife and fisheries populations, resource, & habitat management; law enforcement; social interaction between user groups; user group needs and desires; noxious weed management; private land in holdings and access easements; cultural resources; and long term flexibility to quickly respond to changing conditions on the forest.

Sincerely,

A handwritten signature in blue ink that reads "Gary Bertellotti". The signature is stylized and cursive.

Gary Bertellotti
Regional Supervisor
406-454-5846



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Montana Fish, Wildlife & Parks General Comments

- 1) FWP supports an adaptive management strategy for all travel and access plans in the L&C NF travel management area. This would include the flexibility to allow a quick response to changes in the landscape, both natural and social. This would serve to minimize negative impacts on the resource and provide a means to resolve or forestall user conflicts. It could also provide documentation for decreasing or increasing restrictions in certain areas and under specific situations.

To implement this strategy, the following should occur:

 - a) Baseline social and environmental conditions should be established.
 - b) Regular monitoring of social and environmental conditions should take place.
 - c) Limits of acceptable change should be established. This process would include triggers that when met, would indicate management actions to maintain and protect resources.

- 2) Any plan that is adopted must have a specific enforcement component. Current enforcement presence will provide little incentive for users to follow travel plan philosophy and restrictions and result in growing user conflict, social and resource impacts, and ultimately a failure of the plan. FWP recommends that priority be placed on an enhanced enforcement presence by the USFS, that would include additional USFS officers, prosecution of violators, and cooperation with other agencies. Implementation of any "Travel Management Plan" should be followed with a multiple year educational campaign and extensive enforcement presence that promotes a "zero tolerance for violation" strategy. This will result in a high level of public awareness and the conditioning of users, eventually resulting in a high level of voluntary compliance.

- 3) Access to public lands is essential to management of fish, wildlife resources and a sense of fairness to all user groups. Obtaining permanent access easements through private lands should be a priority. FWP encourages USFS to obtain public access where private property currently impedes access to public lands and resources.

- 4) Balanced travel access to all user groups will be important if the public is going to support USFS plans and actions. Assure all types of travel modes receive appropriate travel routes while reducing the potential for social conflict. The USFS plan should recognize the majority of user groups and balance management strategies to best provide quality experiences and that protect the valued resources under your control.



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- 5) Roads, trails and access points that are to be open should be signed open and identify restrictions. As part of the travel plan, all others routes are closed to use and are not signed. Educating the public that only designated travel routes are open all others are closed. This would be also illustrated through a travel plan map produced and distribute through USFS offices.
- 6) FWP would like to see the number of seasonal road restrictions in the Travel Plan consolidated and decreased to four or less.
- 7) FWP believes weeds are a major problem both on private and public lands. USFS should require only certified weed free hay within Lewis and Clark National Forest and state and private lands that require travel through federal lands for access. A weed management plan that incorporates closures or travel restrictions in infested areas would reduce the spread of noxious weeds.
- 8) FWP would recommend the incorporation of a food storage order into the travel plan.



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FISHERIES

Judith/Musselshell Drainage Fisheries

The travel plan proposed in Alternative 5, the resource based alternative, should benefit fisheries. FWP commend the Lewis and Clark Forest for proposing to reduce vehicle/ATV use in the Middle Fork Judith and its tributaries like King Creek. Sediment covers the substrate in the Middle Fork and trout populations are much lower than expected for the size and the water chemistry of the stream. Closure of the road going up North Fork Running Wolf as proposed in Alternative 5, should benefit the pure WCT in that stream.

Alternatives 3 & 4 show a new ATV trail up the South Fork Judith, including Deadhorse Creek and Russian Creek. This trail would have a negative impact on the native westslope cutthroat trout. Creating an ATV corridor here does not correspond with the management of this area proposed in the Judith DEIS and would compromise the benefits of a large expensive barrier that is being constructed to protect the WCT in the South Fork drainage. An ATV trail up the South Fork Judith would hurt aquatic integrity and impact the most extensive native westslope cutthroat trout in the entire Judith drainage. The existing trail has several fords and would require extensive widening and tree removal to make it suitable for ATVs. It would make more sense to retain ATV trails where streams have already been impacted instead of creating a new trail system on a relatively pristine and "functioning" reach of stream.

ATV/vehicle fords may currently impact fisheries in Daisy Dean, Yogo Creek, Middle Fork Judith, North Fork Running Wolf and Haymaker Creek. Sampling in 2006 on Daisy Dean Creek found that brook trout populations were surprisingly low in the area of ATV crossings. Under Alternatives 3 and 5 ATV trails would still run up Daisy Dean and Haymaker Creek. To protect fisheries it is recommended that wet ATV/vehicle crossings be minimized as much as possible either by trail re-routing, closure or bridges. Also new ATV trails should not be opened along riparian areas. Motorcycles do not seem to have as much impact as ATVs.

The DEIS did not look at the dispersed camping roads and crossings along Yogo Creek. These roads provide access to camping sites and fishing and do not show up on the Alternative 5 map, but appear on other alternatives. The Judith DEIS indicated most of those fords had little risk to hydrology, so there might be minimal impact to the fisheries if they remain open. However, they should be evaluated for the travel plan.



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Limited road/trail maintenance, illegal trail use and pioneering of new trails appear to be pervasive problems across the forest. The USFS must have a plan and the enforcement presence to prevent illegal and pioneered ATV trails from developing off of designated ATV trails. As the Forest Service attempts to accommodate increasing ATV use, additional parking will be required. It is important to upgrade the trails to ATV standards prior to opening them to ATV use and to maintain the trails to prevent resource impacts. If ATV groups are willing to work on trail maintenance it may be helpful if the USFS hires a liaison that will work to coordinate with these groups and help maintain the trails. With only about 5% of the roads maintained in the last 6 years, it will be a challenge for the USFS to put roads back into conditions that will meet standards.

In conclusion, please: 1) Follow Alternative 5 for the South Fork Judith River and North Fork Running Wolf; 2) Try to reduce impacts of fords on Haymaker Creek/Daisy Dean Creek; 3) Include the dispersed recreation fords at Yogo Creek in the evaluation; 4) Insure that roads/trails will be maintained to standards that limit resource impacts.

FISHERIES

Remainder of L&C National Forest

Motorized travel can have significant impacts on stream and fishery resources through increased sedimentation, direct impacts to bank stability, and damage to riparian vegetation. Minimizing these impacts is critical to maintaining Montana's excellent and world-renowned fisheries.

One of the largest land management problems on our national forests is the enforcement of existing laws and regulations. In the case of motorized travel, ATV and motorcycle users frequently violate travel plans by creating new trails, typically with no consequence. This is due to the limited personnel and funding to enforce laws and regulations on the forest. Given that the lack of enforcement is likely due to the lack of funds for enforcement activities, I recommend that the Forest pursue ways to generate income to fund enforcement activities by charging users fees, especially OHV users. Traditionally, forest planning focused on harvest activities—which generated income for the Forest to manage these lands. With the focus of forest management shifting to recreation, an OHV registration fee for use on the forest could generate the necessary money to fund enforcement activities, and hopefully help to better manage forest resources.

In addition to enforcement activities, the Forest could do a better job of maintaining roads and trails with money generated from a user-based fee such as the OHV registration fee. The Forest should secure funding to ensuring that OHV trails are low impact (e.g., installing erosion control devices, identifying and preventing OHV-related erosion into streams, etc.) and for trail maintenance, prior to building additional trails.



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Frequently, roads that are closed to motorized travel are not properly decommissioned to prevent future impacts to streams and subsequently to fishery resources. Two wooden box culverts exist on Jumping Creek; these culverts are failing and contributing hundreds of cubic yards of sediment into the stream. These culverts have not been remedied because of funding and so access can not be gained in case of a fire. The impacts associated with situations like the one above area easily fixed, and would hope that the Forest takes the appropriate measures on any closed road to prevent these types of impacts in the future. In general, trail maintenance is critical to all motorized travel. There are many current examples where lack of maintenance on ATV trails is causing resource damage. Some examples of areas where ATV trail maintenance needs are high include: the Upper Harley Creek area, Jefferson Creek headwaters, and the Sheep Creek area.

There are several areas of the forest open only to motorcycle traffic, and traditionally the areas used by motorcycles show little impact. If ATVs are allowed on these sections of trail the associated impacts will increase due to the increase in trail width and the additional ground disturbance that ATVs cause and the common practice of trail pioneering. FWP would encourage the Forest Service to restrict open motorcycle trails to 2 wheeled OHV's. Some specific examples are: Deep Creek Park trails and the Pilgrim Creek Trail.

Several sensitive areas exist on the forest that should remain OHV free. Several wet parks and meadows (such as Oti Park) may be badly damaged if OHV's and ATV's in particular, are allowed to pioneer trails in them. These trails will cause increased sedimentation in surrounding streams and have impacts on water quality. In Deadman Creek, the proposed ATV loops will be in areas with unstable soil types. ATV use in this area will lead to increased sedimentation into the Sheep Creek Drainage, which already has water quality problems.

The following are site-specific comments related to the proposed plan:

Deep Creek Park

The proposed plan for motorized use in the lower part of trail 311 (in the Deep Creek Park area) encourages fording of the Smith River. Fording of the Smith River will cause damage to stream banks and riparian vegetation and will increase sedimentation and turbidity. In general, fords should only be utilized in areas where traffic is infrequent; this would not be the case if the lower end of trail 311 is open to ATV use. Allowing ATV use on the lower end of trail 311 does not provide much benefit to the public, since access to the trailhead is controlled through private land. Therefore, FWP recommend that the trail be designated as non-motorized, and would prefer any alternative that minimizes fording of the Smith River. Trail 338 down to South Fort of Deep creek could be utilized by OHV's but at the point where 338 reaches South Fork of Deep Creek restrictions should be imposed to keep OHV's from traveling further on 316 or 308.



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Sawmill Gulch

The proposed trail in the Sawmill Gulch area is perplexing. In 2001, the Forest Service conducted an EIS with a record of decision concluding that off-road motorized use (specifically stream fording) caused significant damage to streams and fish habitat. Based on this EIS/ROD the Forest closed the area to motorized travel. Now the proposed action includes allowing motorized travel in the Sawmill Gulch area again. This proposed action will cause damage to fisheries resources in the Sawmill Gulch area and should be reconsidered.

WILDLIFE

FWP Region 5 – Southeastern portion of L&C NF

The Montana Fish, Wildlife & Parks (FWP) Region 5 Wildlife staff thanks you for the opportunity to comment on the Jefferson Division Travel Plan for the Little Belt Mountains, Lewis & Clark National Forest (Forest). We appreciate the changes that were made as a result of our comments during the scoping period last November, but many of our concerns were not adequately addressed with any of the alternatives provided in the Draft EIS.

Habitat security during the hunting season and in summer/winter/spring is an important component of FWP's elk management program. The development of a comprehensive road management plan for the Forest that maintains or enhances elk security, while still allowing adequate access for hunters to harvest elk on the Forest, was identified as a need in FWP's 2004 Elk Management Plan (see Little Belts EMU section). FWP's goal is to keep more elk on the Forest through the hunting season, thereby improving the opportunity for hunters to harvest elk on national forest land in the Little Belts.

The current level of motorized recreation use in the Little Belts has likely had the effect of decreasing elk security on the Forest, particularly along the boundary, thus reducing the amount of habitat that is actually used by elk. The decreased security on the Forest displaces elk to more secure private land during the summer and/or prior to the start of the general hunting season. Much of the private land adjacent to the Forest in this area is closed to the general hunting public because of outfitting or other reasons, resulting in lowered harvests and over-objective elk populations. High populations of elk often lead to increased elk damage on private land, including those private landowners that allow public hunting during the general season. While motorized recreation is not the only factor contributing to elk displacement, it is one that could be addressed through the new travel plan.

It appears that the proposed plan will increase the densities of open roads and trails in this portion of the Belts. Many of the proposed changes identify as "open" those trails that are presently being



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used by motorized vehicles, even though they are not shown as open in the current plan. While the problem of people driving where they are not supposed to and/or creating new routes is the real issue, the plan simply adds many of these currently off-limits trails and roads to the open category. We are concerned that by officially sanctioning motorized travel along these additional miles of trails and roads, there will be a proliferation of even more new trails and roads in the future.

Under the proposed travel plan there appears to be additional restrictions placed on roads and trails in the higher elevations of hunting district 540 and/or on trails that lead to higher elevations, e.g. 8815 and 602 while there has been a decrease in restrictions or increased densities of roads and trails in the lower elevations along the forest boundary. An example of this is in the area between the Dry Fork of Daisy Dean and Antelope Creek. Under the proposed plan, all or most of the trails are shown as open to ATV travel from June 30 to September 1. This will likely increase off-road use of the area, thereby increasing elk disturbance levels prior to the beginning of the big game hunting season. High road densities in the foothills portion of hunting district 540, is leading to increased levels of human activities during late summer and the archery season, which serves as a warning for elk to move to private lands. By the middle of the archery season, many elk have left the Forest to spend the remaining portion of the fall and winter on adjacent private lands. If an analysis of the habitat effectiveness of the area along the boundary of the Forest Service from the Dry Fork of Daisy Dean Creek to Antelope Creek and two miles deep from the Forest Service Boundary were done, we would surely find that habitat effectiveness was much below 50%. It appears that by measuring habitat effectiveness for the entire hunting district the problems that exist along the boundary of the Forest Service were masked. We are not suggesting that all these trails be closed, but that a reasonable system is maintained for use by ATV enthusiasts, while maintaining habitat effectiveness at a minimum of 50% in this important area. In our opinion additional restrictions made on roads and trails in the boundary area should include closure during the summer months, prior to the onset of the archery season.

The Region 5 Wildlife staff also has the following concerns that were not adequately addressed in the Draft EIS:

- 1) Methods utilized to close roads or trails.
- 2) How the Travel Plan will be implemented with the current level of USFS enforcement staff.
- 3) What will prevent an increase of user-created routes (pioneering)?
- 4) Closure of routes that are through private land that is closed to the general public for recreational purposes. Routes on the Forest reachable only from private land routes that are closed to the public should be open to motorized travel only for management



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purposes such as moving and/or accessing cattle in a grazing allotment. These routes should not be open to motorized travel for hunting or other recreation unless there is an easement or other agreement that guarantees public access to the Forest from the private land.

- 5) Concerning the Haymaker Game Range, the road going through the Game Range is still shown in the wrong location on both the winter and summer/fall USFS maps. The road goes up Morris Coulee to the Game Range, then to the Forest Boundary. Two open roads branch off the main road just north of the southern boundary of the Game range, to provide access to the benches east and west of Morris Coulee and Forest lands along those benches. The Game Range is closed to public access from the day following the general rifle season through May 15. These changes should be reflected in your travel plans.

If you would like further clarification of these comments, please contact Jay Newell, FWP Wildlife Biologist in Roundup at 406-323-3170.

WILDLIFE White Sulphur Springs Area

Concerns in this area are chiefly related to the potential impacts of the travel plan on elk (summer alternatives) and wolverines (winter alternatives). In regards to elk, the Department wants to reiterate its desire to work with the Lewis & Clark National Forest to help develop a comprehensive road management plan that maintains or enhances elk habitat effectiveness and elk security on national forest land, while still allowing adequate access for hunters to harvest elk on federal land. As mentioned previously in our scoping comments, the Department's goal is to keep more elk on USFS land through the hunting season, so that elk do not seek out private land "refuge" areas; thereby, improving the opportunity for hunters to harvest elk on national forest land. In order to help obtain that goal, the Department believes that there must be adequate seasonal or yearlong effective habitat that provides security for elk on national forest land in the travel plan area. In regards to potential road closure decisions, where the roads and trails lie in relation to the surrounding landscape, types of habitat they traverse, etc. needs to be taken into consideration, so that at least in regards to elk, road closures provide a positive benefit to elk habitat and roads aren't closed just for the sake of closing roads. In regards to wolverines, the USFS's effects analysis on wolverines, which is a furbearer managed by the Department, has raised concerns regarding the potential impact to wolverines from winter travel in a few areas as proposed under the different winter travel alternatives.



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Elk – Summer Travel Alternatives

The Department feels that the current level of motorized use in the analysis area is having a negative impact on elk in many of the hunting districts covered by the travel plan. The effects analysis presented in the DEIS indicates that USFS's recommended standards and guidelines are not being met in many areas with the current level of motorized travel. As identified in the USFS's effects analysis, Management Areas (MAs) C, E, and I, which according to the Lewis & Clark National Forest Plan place a great emphasis on managing for wildlife, all currently exceed the USFS's recommended open road density. Four of the 11 hunting districts (416, 449, 454 & 540) in the analysis area have less than 50% habitat effectiveness, which according to the effects analysis is recommended 'where elk are one of the primary resource considerations'. Only 2 of the 11 hunting districts currently meet the USFS's recommended minimum standard for elk security (30% of analysis unit) during archery season, and only 3 of the 11 meet the standard during the general rifle season. As such, the Department feels that the no action summer alternative (Alternative 1) is unacceptable from a wildlife impacts point of view in the majority of hunting districts covered by the travel plan. While any of the 3 summer-action alternatives (#'s 3-5) would improve the current situation, it is felt that that the overall direction of Alternative 5 provides the best balance of providing a reasonable level of public access, while also having a positive impact on elk habitat. Please reference other comments made by FWP staff addressing other portions of the Travel Plan according to their areas of wildlife management responsibility. While as a Department wildlife biologists favor the overall direction of Alternative 5, FWP believes that there is still room for considerable modification to the alternative to improve elk habitat effectiveness, elk security and hunter access. The following are recommended modifications to Summer Alternative 5 by hunting district:

Castles – HD 449

- Recommend a 9/1-12/1 seasonal closure at a minimum on Trail #620 (Whetstone Ridge) to improve elk security in this area during the hunting season. Whetstone Ridge is the primary security feature on the east end of HD 449. Trail #620 runs right along the ridge and through multiple saddles, which could negatively impact elk use and movement in this area during the hunting season. Currently, elk dispersal to private land with restricted access south of Whetstone Ridge during the hunting season limits the availability of elk to the general public in this area. Improved security in the Whetstone Ridge could result in more elk being available to the general public during the hunting season. Due to their location on the landscape, route #'s 694-A, 15933 & 15929 north of Whetstone Ridge could all be left open to some form of motorized use with minimal impact on elk for either a portion or all the year. Recommend a 5/15-6/30 closure on route #'s 15933 and 15929, as this is area has been identified in the past as an elk calving area (need to visit about other identified elk calving areas in this HD as well).



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- Recommend a yearlong closure (non-winter) to all motorize use on that portion of route #15942 (user created) east of its junction with route #15962 (west Flagstaff Creek area) to improve elk habitat effectiveness and security in this area.
- Recommend a yearlong closure to all motorized use on either all or portion of route #15981 (user created) north of Checkerboard Creek to improve elk habitat effectiveness and elk security in this area.
- Due to their location on the landscape all or at least a portion of the routes in the Slaughter House and Corral Creek areas could probably be left open with minimal impact on elk.

Castles – HD 452

- Recommend leaving Trail #618 open for ATV and trail bike use to provide some level of motorized access to the south end of the Castles particularly during hunting season. An access easement should be pursued across the private land (Rostad's) in Section 33. Were that the case, then FWP would recommend leaving route #'s 15998 and 624 also open to ATV and trail bike use to provide a motorized route to Castle Lake. Instead of having Trail #618 open for motorized use, the other alternative would be to leave Trail #U651 open to motorized access and then try to tie into route #'s 15998 and 624 (would prefer that Trail #618 be used). Absolutely do not support a loop route in this area as proposed in Alternative 3, as it would negatively impact elk habitat effectiveness and security in this area and result in increased elk displacement to private land.
- Recommend as an alternative to the proposed large ATV loop route (Alt. 5) in the Castles that instead the loop route be made with that portion of Trail #716 from its junction with Trail #719 to its junction with Trails #717 and #725 along with Trail #725 (existing ATV trail). Recommend then that Trail #716 from its junction with Trail #719 to its junction with Trail #723 and route #9211 be made non-motorized to improve elk habitat effectiveness and elk security in this area, as elk displacement to private land is a concern in the Willow Creek area. This would also eliminate the need for a seasonal closure on a portion of the loop route as proposed in Alt. 5. (no need for seasonal restriction on Trail #719) and would also utilize an existing ATV trail (Trail #725). If there is a desire to maintain the proposed ATV loop route, then recommend the same closure dates (#13) be used for route #9211 (elk calving area), as is on adjoining portion of Trail #716. Regardless of what the decision is regarding ATV use, recommend that route #9211 be left open to all motorized vehicles with seasonal restrictions to allow more hunting access. The small loop routes formed by portions of Trail #'s 716 (route #9211), 717 and 723 with Trail #713-A and the main county/USFS road could be left open for trail bike and/or ATV use with probably little impact on wildlife, because of the close proximity to the established campgrounds in that area.



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Little Belts – HD 416

- In the Miller Gulch area route #6478 to its junction with route #6472 could be left open along with route #6472 to motorized access during the hunting season with minimal impact to elk because of their location on the landscape. Likewise, route #831 and route #6504 in the Decker Gulch area could also be left open to motorized access during the hunting season to promote further access with minimal impact to elk because of their location on the landscape.
- Recommend closing the lower portion of Trail #711 from its junction with Trail #721 to its junction with the county road yearlong (non-winter) to all motorized uses to improve the elk habitat effectiveness and security in this area. Recommend going to a 9/1-12/1 seasonal closure on motorized use on Trail #712/720 and Trail #724 (also lower portion of Trail #711 as described above if it is left open to motorize use). Elk displacement from this area to private land with restricted access prior to the general rifle season is a major problem. As a result, elk are largely unavailable to the general public during the rifle season. This situation may be improved if elk security in the area is enhanced.
- Recommend that route #6414 be left open to ATV and trail bike use during the hunting season to promote better access in this portion of the hunting district.

Little Belts – HD 418

- Recommend closing routes #6420, #6421, #2011, and #6513 yearlong (non-winter) to all motorized vehicles to enhance elk habitat effectiveness in this area. These routes are parallel routes in close proximity to the main South Fork of the Judith road and the High Spring Creek route/trail #6419.
- Recommend leaving route #2045 south of Hidden Lake open to motorized travel during the hunting season to maintain some level of access in this area (support hunting season closure on branch roads).
- Recommend that the Alternative 3 proposal be adopted for route #6392 (Dry Pole Canyon) and for Trail #'s 458 and 603, which would allow these routes to remain open during the hunting season.
- Recommend that routes/trails #475 (portion of) and #476 be left open for either dual use or ATV/trail bike use year round (non-winter) to facilitate some level of hunting access to this portion of HD 418. Recommend closing to all motorized use year round that portion of trail #475 east of its junction with Trail #476 to improve elk habitat effectiveness and security in that area. Recommend trying to utilize existing roads and pursuit of an access easement from the Wertheimer Ranch to connect trails #476 and #480 rather than constructing a new trail. Recommend that Trail #480 also be left open for motorized use during the hunting season.



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- Recommend leaving route #6558 south of Deadhorse Creek 'as is' to allow some level of motorized hunting access in this area.
- Do not support the new trail construction proposed between Dry Pole Canyon and Bower Canyon, as believe that the proposed location of this trail will have a negative impact on wildlife habitat in the area. Would instead recommend trying to connect route #6458 with the Bower Canyon route (#6522/474).
- Recommend leaving the road (#6390) up Hay Canyon open year round (non-winter) to at least ATVs and trail bikes and opening up Trail #456 and route #6419-A to ATVs and trail bikes year round (non-winter) to facilitate additional motorized access for hunting in this area.
- Question the need for an airstrip in the Russian Flat. This area is an identified elk calving area, so a potential conflict exists.

Little Belts – HD 420

- Recommend leaving route #8863 (Hay Coulee) open to motorized use to facilitate hunter access in this area.

Little Belts – HD 432

- Recommend leaving route #3350 open to its junction with Trail #U319(?) for ATV and trail bike use year round (non-winter) to facilitate some degree of motorized access to this area for hunting.
- Support making Trail #732 non-motorized to enhance elk habitat effectiveness and elk security in the area south of Hoover Ridge and Oti Park.
- Recommend leaving route #3311 (McGee Coulee) open to motorized use year round to provide some degree of motorized access to this area.
- Recommend leaving route #3328 (Chamberlain Creek) open its entire length (close spur routes) year round to motorized use to maintain some degree of hunting access in this area.

Little Belts – HD 448

- Recommend leaving route #6398/#6399 (Burnt Ridge road) open to motorized travel during the hunting season to maintain some level of access in this area.
- Recommend leaving route #264 (N. Fork of Running Wolf) open its entire length or at least to its junction with route #8857 to facilitate hunter access in this area.
- Opposed to airstrip in the Middle Fork/Cleveland Creek area. The airstrip, besides creating potential conflicts with other uses of the area, would require the removal of FWP's livestock grazing enclosure in this area. The enclosure has been in existence for 20+ years. Removal of the enclosure would result in lost ability to demonstrate what the potential vegetation community might look like in the absence of livestock grazing.
- Support the Alternative 3 proposal for new trail construction in the Middle Fork Ranch area to avoid user conflicts with private property owners. Also support the reconstruction of Trail #429 along with new construction to provide an ATV/trail bike route connecting route #8906 with the Middle Fork Ranch area, subject to a hunting season closure of 10/15-12/1.



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Little Belts – HD 454

- Recommend moving the closure location on route #6475 to where the road starts to enter the timber to facilitate better hunter access in the area north of Charcoal Gulch.
- Do not support the proposed ATV/trail bike loop route proposed in the Higgins Park area, as believe that it will have a negative impact on elk habitat effectiveness and security in the area. Recommend new construction to connect route #6467 to #6464 north of Higgins Park, and then closing year round (non-winter) that portion of route #6464 from this new junction to its first junction with route #6467 to all motorized access to increase elk habitat effectiveness in this area. Route #6467 would then be the primary access route in this area and would recommend that it be open to all motorized vehicles. Its location on the landscape would have less negative impact than the current #6464 road. Likewise, recommend also closing route #6466 year round (non-winter) to all motorized access to increase elk habitat effectiveness and elk security in this area. Both the current #6464 and #6466 roads run along ridges, through saddles and open meadows, all of which have a negative impact on potential elk use in this area.

Winter Travel Alternative

Generally support Winter Travel Alternative 3, but concerns exist and would recommend these modifications.

Castles

- Routes #694, #694-A, #15929 and #15933 in the Pasture Gulch area could all be left open year round for motorized use, except for a recommended 5-15-6/30 closure for elk calving. This area was in the past mapped as winter range; however, feel that this area is probably not winter range at least for elk. Would recommend modifying the map to show only that area south of Green Canyon and Whetstone Ridge as being winter range in this area. Having the Pasture Gulch area open during the winter would also facilitate additional access for mountain lion hunters in the Castles during the winter.

Little Belts

- Concerned about the effects on potential wolverine denning habitat of having route #'s 3328 (north from junction with Jefferson Creek road #267), #267 (north from junction with road #3356 in the Slide Rock Pt. area), and #382 (west from its junction with road #8823) in the Mount High area open to winter motorized travel. All three of these routes run through or are in close proximity to areas identified by USFS staff in the DEIS analysis as being areas with a high concentration of potential wolverine denning habitat. Wolverines are believed to be sensitive to disturbance from motorized vehicles, especially while denning (see discussion in DEIS). Wolverines are listed as a sensitive species by the



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USFS. Having adequate habitat protection safeguards in place may help prevent future endangered species listing. As such, recommend that all three of the aforementioned routes being closed to winter motorized travel.

Other Issues of Concern

The Department believes that the 1997 winter range and calving information that was used in the analysis needs to be updated in areas (see comment related to winter travel in the Castles for one area).

The Department is also concerned that enforcement and monitoring of the travel plan and road closure methods were never discussed in the analysis. Enforcement and closure methods will affect how much illegal use occurs once the plan is implemented. We encourage the use of gates or obliterating and rehabilitating any closed road/trail to prevent unauthorized use. The Department recognizes that some closed routes may need to be left available for fire and administrative use purposes. We also support the idea of only having designated routes or trails open and everything else being closed. However, the Department is concerned about the USFS's proposal that has been mentioned at public travel plan meetings about having future travel plan maps only show routes that are open on the map. In order for this to work as planned, the USFS will need to do a much better job of signing roads and trails in the field. In addition, ensuring that road/trail number signs in the field match what is on the travel plan map will need to be a point of emphasis. Recommend having a map that shows all the existing roads/trails with roads/trails that are open for public use highlighted in some way. That way if people come to an unmarked road intersection they should hopefully be able to tell which is the legal route.

The Department also feels that the number of closure dates needs to be reduced and consolidated in order to make the travel plan user-friendlier. Recommend adopting the following closure dates, in addition to yearlong closures, to be used individually or in combination: 9/1-12/1, 10/15-12/1, 12/1-5/15, 5/15-6/30. This list of closure dates would cover both archery and rifle season closure dates and winter range and calving closure dates.



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WILDLIFE Remaining Area of L&C NF

Over the past couple of years, Montana Fish, Wildlife and Parks (FWP) biologists, have worked closely with USFS biologists and recreational planning crews on travel issues, big game management goals and objectives, habitat goals and objectives and many other subjects in preparation for the current Little Belts Travel Plan process. FWP and USFS personnel have worked diligently to achieve sound big game and habitat management prescriptions in Hunting District (HD) 413 on USFS lands. The following comments address the northwest portion of the Little Belts.

There are seven major wintering elk populations within, and/or adjacent to, Hunting District 413. These areas include: Belt Park area, Deep Creek Park, north Black Butte area, Tiger Butte area, Gliko/Howell Ranch area, Trout Creek area just west of the Smith River in HD 445, lower Tenderfoot Creek meadows and south of Tenderfoot Creek in HD 416. Numbers of elk observed in these wintering areas during FWP 2005-06 winter aerial surveys totaled approximately 1,000 elk. Most of these elk utilize USFS lands in HD's 413 and 416, along with private lands in HD's 413, 416 and 445 throughout spring, summer and fall months, but ultimately winter almost entirely on private lands. As elk numbers have been increasing in most areas of the Little Belts, game damage complaints from private landowners during winter months have also increased the past few years. These lower elevation private land foothills also provide wintering areas for the majority of the mule deer that migrate out of the National Forest. Having four big game outfitters permitted on USFS lands in HD 413 coupled with very little public elk hunting on much of the adjacent private land, FWP would recommend continued motorized public access in HD 413 except trail number 311 coming from the Smith River. Trail 311 from the Smith River is being used by exclusive landowners that are pioneering a private trail system on the Deep Creek side of the Smith River and should be obliterated or restricted to horse and foot traffic only.

Motorized access from Monument Ridge side down trail 338 to South Fork of Deep creek would be acceptable but should be restricted along the South Fork. Reasonable public access, especially during hunting season, is critical to achieving an annual elk harvest goal and maintaining elk numbers within FWP Elk Plan objectives. As mentioned in other areas of these comments where possible, travel plans that keeps elk on federal lands and reduced travel induced movement to private lands is desired to reduce game related crop damage and allows for additional public harvest.

Alternative 1 of the Travel Plan Draft EIS is labeled as "Existing Condition". Current elk and deer populations are at or above objective levels in the majority of the Little Belts including HD 413



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and have seen very stable big game populations for quite some time. This speaks loudly to habitat security and quality on both the Forest and adjacent private lands. This would seem to indicate that the current travel plan is working in HD 413. "Modifying" the existing condition may be the best alternative specific to HD 413, leading to the following observations:

In the draft EIS, the USFS uses a guideline of having at least 30% secure habitat as a minimum standard during hunting seasons (p. 234). According to the draft EIS on page 235: "During the rifle hunting season (October 15 to December 1), only Hunting District 413 and Hunting District 448 in the Little Belts and Hunting District 580 in the Crazyes meet the minimum guideline."

Table III-78 on page 245 indicates HD 413's existing condition has the lowest density of open motorized routes (roads and trails) of all Hunting Districts in the Little Belts. The majority of motorized trails in HD 413 are trail bike specific. During rifle seasons and sometimes during archery seasons, weather conditions dictate trail bike use, thus big game security actually increases as the season progresses, as most areas in HD 413 are inaccessible to trail bikes after the first snowfall.

The draft EIS on page 245 also states: "Areas where elk are one of the primary resource considerations should have habitat effectiveness of 50% or greater (open road density <1.9 mi/sq mi)". Table III-79 on page 245, indicates HD 413 has 57% elk summer habitat effectiveness under "existing condition alternative 1", which is the highest in the Little Belts and well above minimum USFS standards, supporting the idea that the existing condition is working.

Page 240-241 in the draft EIS discusses "Elk Management Plan Objectives" and "Existing Hunting District Habitat Conditions". In the Elk Management Plan Objective section, current observed elk populations and elk population objectives as mentioned in the FWP Elk Management Plan should have been identified by Hunting District and incorporated in travel plan analysis. The section "Existing Hunting District Habitat Conditions" entertains concerns of motorized use impacts on elk habitat use, elk population management and recreational hunting opportunities. Although motorized use may sometimes impact habitats at the local level, declining "quality" elk habitat from conifer encroachment, lack of habitat manipulation through fire, logging and/or prescribed grazing systems (e.g. deferred, rotational, rest-rotation as examples), may be a bigger issue across much broader landscapes on USFS lands. Increased security via travel plan alterations doesn't always mean increased elk use, if quality habitat doesn't exist.

A statement on page 256 of the EIS mentions: "On elk winter range, hunting district 413 has the least amount of winter range area unprotected (819 acres)." Table III-86 on page 257 elaborates that only 4% (819 acres) of elk winter range in HD 413 is open to snowmobiling. Table III-87 indicates HD 413 has only 23% of mule deer winter range open to snowmobiling, second lowest



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percentage of all HD's, indicating that the existing winter alternative 1 (existing condition) is working very well to protect big game winter ranges and wolverine denning areas. Map 12 of the draft EIS indicates wolverine denning areas in the Pilgrim Creek, Thunder and Big Horn Mountain areas.

Numerous times, the draft EIS discusses collaborative efforts by FWP and USFS biologists to map big game winter range, calving and/or security areas. It then states that the latest mapping update of elk and mule deer winter ranges/calving areas occurred in 1997 based on local knowledge of area biologists as defined in Map 11. Map 11 does not indicate elk calving use in the Ming Coulee, Belt Park, lower Tenderfoot and Tiger Butte private land areas of HD 413.

Elk utilize these areas throughout the year. The map does not indicate elk winter range in the Belt Park, Ming Coulee, Tiger Butte and lower Tenderfoot Creek areas. Over the past few years, elk have readily utilized these areas as winter range. As mentioned, FWP and USFS biologists have met to discuss these topics many times over the past three years and have constructed updated versions of Map 11, which were not utilized in the draft EIS. If "new" data is available for big game use in these areas, why is it not addressed in the draft EIS and used in the travel planning process?

With this information in hand, the USFS should consider continuing reasonable motorized access for the general public in HD 413 as defined in "existing condition" Alternative 1, with some thoughts on the other three proposed Alternatives:

- The proposal to allow ATV access from the east to the Deep Creek Park area as identified in Alternatives 3 & 5 raises a concern. The influx of ATV users to the area will most likely decrease elk security, especially during hunting seasons. Increased ATV use also comes with potential habitat degradation consequences.
- Trail 309 heading northwest from Deep Creek Park and Trail 311 heading east from the Smith River to Deep Creek Park on the existing USFS map (2003) and Alternatives 1 & 3 are identified as ATV trails. The general public has no access to these ATV trails as the nearest access is ATV trail #338 from Logging Creek road, which stops at the confluence of the Smart and South Forks of Deep Creek. Private landowners from the Smith River area east of USFS lands should not have ATV access to the Deep Creek Park and all associated pioneered trails. area (USFS lands) without equal access for the general public.
- The Deep Creek Park area is identified as a critical elk calving area (EIS Map 11), thus motorized travel in the park during calving periods should be restricted.



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- A portion of HD 413/416 that has good elk habitat but is compromised by motorized trail use is the Packsaddle, Fisher and Rugby Creek areas. These trails do not exist on the current 2003 USFS travel plan map. Closing these trails would greatly increase elk security throughout the year. The public would continue to have motorized access to this “secure block” via the Monument road to the north, Daisy Springs trail to the west, Taylor Hills trail to the east, and the Tenderfoot trail to the south.

STATE PARKS – SMITH RIVER CORRIDOR

The Smith River Corridor is unique in many ways. Both USFS and FWP manage river access and floating activities through a restrictive permit system. Recreational activities are controlled to maintain a wild and scenic experience, reduce impacts to natural and cultural resources in the corridor, and to provide to the public a high quality experience. The quality of experience is based on limited social conflict, wilderness type serenity, high quality and rich fish and wildlife resources, low human impact and contact, and all the personal reasons each user finds in traveling the River. There are a few general issues that need to be adjusted in USFS travel management plan and some specific concerns that are also referenced below.

General Comment

Access to the Smith River and other federal and state property in the corridor by local private landowners continues to result in complaints and social conflict. Use of ATV's in the river corridor, through the streambed, over stream banks, and at or through designated camp areas is becoming more frequent and resource damage and user group conflict is resulting.

Private access to gain exclusive access to USFS and state lands, which is reducing FWP ability to manage social conflict, fisheries and wildlife management needs to be managed through restrictive OHV use in the corridor. Trails 311 and 309 from the Smith River access point are trails that should have only horse and foot traffic.



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PARKS Trail Specific Comment

- Trail 342 does not reach the inner canyon.
- Trail 331 would reach the river at the Sunset boat camp. And if it does should be foot traffic only. Concern that this camp designated for float trips would be used by other users.
- Trail 311 should be horse and foot traffic only and existing damage caused by ATV's should be restored and restore all pioneered trails from 311 back to natural non trail conditions.
- Trail 309 comes in at Fraundhofer boat camp and should be restricted to foot and horse traffic.
- Motorized trailsreaching the river degrades the natural environment and detracts from the experience of other users (river recreationalist).
- During low water motorized vehicles are causing environmental damage to stream bed and riparian areas (most notably near trail 311) and shold be restricted in the river corridor.

SUMMARY OF FWP COMMENTS

Travel plans of such magnitude are difficult due to multiple factors and interests. FWP recognizes the difficult task the USFS has ahead. During the final steps to finalize the travel plan if the USFS needs any clarification of FWP comments, we would be glad to meet with you and your staff to address your questions and concerns. The following FWP staff are the experts with regards to the comments and the knowledge of the resources on the ground in the areas addressed in the proposed travel plan and can be contacted at the address on page one:

Graham Taylor
Wildlife Manager
Great Falls, MT
406-454-5860

Cory Loecker
Wildlife Biologist
Great Falls, MT
1-406-454-5864

Adam Grove
Wildlife Biologist
White Sulphur Springs, MT
1-406-547-2585

Steve Leathe
Fisheries Manager
Great Falls, MT
1-406-454-5855

Anne Tews
Fisheries Biologist
Lewistown, MT
1-406-538-4658

Roger Semler
Regional Park Manager
Great Falls, MT
1-406-454-5859

Ray Mule
Wildlife Biologist
Billings, MT
1-406-247-2960

Travis Horton
Fisheries Biologist
Helena, MT
1-406-444-7319

Gary Bertellotti
Regional Supervisor
Great Falls, MT
1-406-454-5846

-2-F-1-3-D



Montana Fish, Wildlife & Parks

Lesley W. Thompson
USFS Supervisor, Lewis & Clark National Forest
1101 15th Street North
P.O. Box 869
Great Falls, MT 59403-0869

Mr. Thompson,

In response to the draft EIS USFS Travel Plan alternatives currently open for public comment, I provide the following thoughts.

Over the past couple of years, Montana Fish, Wildlife and Parks (FWP) biologists, including myself, have worked closely with USFS biologists and recreational planning crews on travel issues, big game management goals and objectives, habitat goals and objectives and many other subjects in preparation for the current Little Belts Travel Plan process. I feel that FWP and USFS personnel have worked diligently to achieve sound big game and habitat management prescriptions in Hunting District (HD) 413 on USFS lands. This northwest portion of the Little Belts falls within my game management responsibilities as a FWP biologist.

There are seven major wintering elk populations within, and/or adjacent to, Hunting District 413. These areas include: Belt Park area, Deep Creek Park, north Black Butte area, Tiger Butte area, Gliko/Howell Ranch area, Trout Creek area just west of the Smith River in HD 445, lower Tenderfoot Creek meadows and south of Tenderfoot Creek in HD 416. Numbers of elk observed in these wintering areas during FWP 2005-06 winter aerial surveys totaled approximately 1,000 elk. Most of these elk utilize USFS lands in HD's 413 and 416, along with private lands in HD's 413, 416 and 445 throughout spring, summer and fall months, but ultimately winter almost entirely on private lands. As elk numbers have been increasing in most areas of the Little Belts, game damage complaints from private landowners during winter months have also increased the past few years. These lower elevation private land foothills also provide wintering areas for the majority of the mule deer that migrate out of the National Forest. Having four big game outfitters permitted on USFS lands in HD 413 coupled with very little public elk hunting on much of the adjacent private land, I support continued motorized public access in HD 413. Reasonable public access, especially during hunting season, is critical to achieving an annual elk harvest goal and maintaining elk numbers within FWP Elk Plan objectives.

Alternative 1 of the Travel Plan Draft EIS is labeled as "Existing Condition". Current elk and deer populations are at or above objective levels in the majority of the Little Belts including HD 413 and have seen very stable big game populations for quite some time. This speaks loudly to habitat security and quality on both the Forest and adjacent private lands. This would seem to indicate that the current travel plan is working in HD

413. "Modifying" the existing condition may be the best alternative specific to HD 413, leading to the following observations:

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-The Deep Creek Park area is identified as a critical elk calving area (EIS Map 11), thus motorized travel in the park during calving periods should be restricted.

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In closing, as you move forward objectively developing a preferred Alternative that captures biological and scientific ideas, public opportunities and values, I hope these comments provide useful. Thank you for the opportunity to comment.

Sincerely,

Cory Loecker
Wildlife Biologist
Montana Fish, Wildlife and Parks
4600 Giant Springs Road
Great Falls, MT 59405
(406) 454-5840

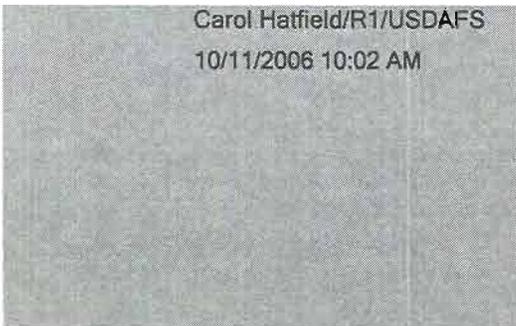
Robin Strathy/R1/USDAFS
10/11/2006 12:31 PM

To Dick Schwecke/R1/USDAFS@FSNOTES
cc
bcc
Subject Fw: travel plan comments

FYI...FWP biologist comments on Jefferson Travel Plan. Generally supports Alt 1 for HD 413. Suggests newer maps of elk calving and winter range be incorporated into final EIS.

Robin Strathy
Lewis and Clark National Forest
(406) 791-7726
rstrathy@fs.fed.us

----- Forwarded by Robin Strathy/R1/USDAFS on 10/11/2006 12:31 PM -----



Carol Hatfield/R1/USDAFS
10/11/2006 10:02 AM

To Lesley W Thompson/R1/USDAFS@FSNOTES, Allen Rowley/R1/USDAFS@FSNOTES, Douglas Dodge/R1/USDAFS@FSNOTES, Robin Strathy/R1/USDAFS@FSNOTES, Laura Conway/R1/USDAFS@FSNOTES
cc Gary Hanvey/R1/USDAFS@FSNOTES
Subject Fw: travel plan comments

Fish and Game biologist Cory Loecker's comments - it sounds like these will be attached to the main letter from the Helena office. Interesting, that Cory worked with our bios throughout the process now has different thoughts. I am glad that our bios are working with F&G on this. This forest (our bios) has an outstanding working relationship with F&G bios here (compared to other forests and regions). It's ok to disagree, because we have different missions.

Carol Nunn-Hatfield
Acting District Ranger
Belt Creek Ranger District
R1, Lewis & Clark National Forest
(406) 236-5511
chatfield@fs.fed.us

----- Forwarded by Carol Hatfield/R1/USDAFS on 10/11/2006 09:34 AM -----



Gary Hanvey/R1/USDAFS
10/10/2006 03:00 PM

To Carol Hatfield/R1/USDAFS@FSNOTES
cc
Subject Fw: travel plan comments

fyi

Gary Hanvey
Zone Wildlife Biologist
Lewis & Clark National Forest