



**Montana Department
of
Fish, Wildlife & Parks**

*4600 Giant Springs Road
Great Falls, MT 59405*

August 16, 2005

Lewis and Clark National Forest
1101-15th Street North
Great Falls, MT 59401

ATTN: Lesley W. Thompson, Supervisor
RE: Rocky Mountain Ranger District Travel Management Plan

Dear Spike:

I reviewed the 375 page *Draft Environmental Impact Statement* on the Rocky Mountain Travel Plan. I invited the biologists and game wardens along the Front to read the document and give me their opinions. I asked my Fisheries Manager and Wildlife Manager to consider this matter. I looked over our file on the Front and reviewed new publications since the 1997 leasing moratorium.

In general, I think your ID team did a good job and laid out reasonable alternatives. Our discussions were involved enough that I can appreciate the controversial and challenging aspects of your endeavor.

POSITION

After considerable reflection, I recommend Alternative 3 for the following reasons:

1. Alternative 3, by your analysis and our analysis, best serves the area's wildlife resources. Wildlife is our business and the main tenet of our agency's charter.
2. This Alternative appears to be the "will of the people." It reflects the overwhelming majority of the individuals and organizations expressing an opinion on this subject to your agency and mine.
3. This Alternative best protects the area's watershed. Water quantity and quality have been the top wildlife issues in northcentral Montana during the drought. Along the Front, we have seen a recent decline in the overall health of riparian systems and an increase in siltation of limited habitat used by relic populations of native westslope cutthroat trout.

4. Alternative 3 minimizes soil impacts. It will reduce impacts on soil displacement, compaction, erosion, and sedimentation. This Alternative will allow USFS to refocus its limited trail maintenance resources to a smaller base helping the Forest and the District to maintain its remaining roads and trails in better condition.
5. Alternative 3 protects the “Badger-Two Medicine Blackfoot Traditional Cultural District” and honors the position of the Blackfoot Nation as expressed by the Blackfoot Business Council and the Tribe’s cultural leaders. It addresses the longstanding controversy over the management of this part of the “ceded strip.”
6. Alternative 3 allows the Lewis & Clark Forest to meet its legal Endangered Species Act obligation for grizzly bears. It fulfills the requirement to defer to grizzly bears on Management Situation 1 lands. It mitigates what appears to be a decrease in grizzlies in the Dearborn-Elk Creek Bear Management Unit and it protects the densest grizzly population on the Rocky Mountain District in the Badger-Two Medicine country.
7. Alternative 3 builds security into existing elk winter range promoting better distribution and it enhances the elk population in the Badger-Two Medicine country.

From a wildlife perspective, Alternative 3 helps by reducing the road density disturbance due to motorized activity and fragmentation. The Alternative avoids identified roadless areas, improves north-south connectivity, cuts general harassment of wildlife and habitat disturbance and it reduces the existing conflict between motorized activity and traditional, non-motorized activity.

Alternative 3 satisfies the constraints of the 1976 National Forest Management Act, the Forest Service Roads Policy, the 2001 National OHV Policy, and the 1993 Grizzly Bear Recovery Plan. It recognizes the national significance of this biologically rich area and honors its four-generation, 100 year-old conservation record.

BACKGROUND

Preparing this memo, I visited with R4 Fisheries Manager Steve Leathe, Conrad Area Wildlife Biologist Gary Olson, Fairfield Area Wildlife Biologist Quentin Kujala, East Front Bear Specialist Mike Madel, East Front Fisheries Biologist Dave Yerk, Choteau Area Warden Tom Flowers, and Conrad Area Warden Rod Duty.

I reviewed our extensive East Front file and the following recent literature:

Joslin, G. and H. Youmaris, Coordinator. 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.

U.S. Fish and Wildlife Service: Benton Lake NWR and Division of Refuge Planning. *2005 Environmental Assessment for the Rocky Mountain Front Conservation Area.*

Montana Fish, Wildlife and Parks. 2005. (Draft) *Montana's Comprehensive Fish and Wildlife Conservation Strategy.*

Keller, David W., Boone and Crockett Club. 2001. *The Making of a Masterpiece, The Stewardship History of the Rocky Mountain Front and the Bob Marshall Wilderness Complex (1897-1999).*

Bureau of Land Management, Maxim Technologies, Inc., All Consulting. 2003. *Blackleaf Study Area-Raptor Inventory; Old Growth Forest Inventory; The Old North Trail and Ethnographic Investigation.*

University of Montana, School of Law. 2003. 27th Annual Public Land Law Conference. *The Endangered Species Act Regulatory and Incentive-Based Alternatives in the West.*

Montana Fish, Wildlife and Parks, and Lewis and Clark National Forest. 2000. *Status and Restoration Strategies for Westslope Cutthroat Trout in Northcentral Montana.*

Crist, Michele et al. The Wilderness Society. 2004. *Roadless Area Conservation Along Montana's Rocky Mountain Front: Are We Losing Ground?*

Crown of the Continent Ecosystem Education Consortium. 2002. *Crown of the Continent: Profile of a Treasured Landscape.*

Fitch, L. and N. Ambrose. 2003. *Riparian Areas: A User's Guide to Health.* Lethbridge, Alberta: Cows and Fish Program.

CONCERNS

1. Wildlife professionals and the conservation community are increasingly concerned about the potential effects of recreation on wildlife and the habitats that sustain wildlife. The on-going recreation boom is a recent phenomenon (last 50 years) fueled by population growth, increasing economic prosperity, technological advances in recreation equipment, and recreational marketing.

Personal travel is now the world's largest industry. In 1994, the Institute for Tourism and Recreation Research at the University of Montana documented the following participation rates and average distance traveled for various recreation activities: walking-day hiking (70%/2.5 mi.), jogging (19%/2.5 mi.) bicycling (20%/4 mi.), off-road 4WD (20%/31 mi.), horse riding (17%/10 mi.), cross-

country skiing (15%/4.5 mi.), snowmobiling (15%/27 mi.), backpacking (14%/5 mi.), mountain biking (14%/6 mi.), ORV riding (12%/15 mi.), off-road motorcycling (9%/25 mi.).

Natural resource management is in the midst of a big adjustment. The long-standing assumption that recreation has little environmental impact is simply wrong. We now know that hunting and non-hunting forms of recreation can potentially have the same end result when it comes to displacing wildlife, reducing wildlife productivity, and increasing wildlife mortality.

All human activity can impact animals through exploitation, disturbance, habitat modification, and/or pollution. The wildlife response can be avoidance habituation, attraction, or death. The effects of recreation on wildlife habitat and, in turn, on wildlife are usually unintended and incremental, but predictable nonetheless.

The traditional approach is to respond to the public's needs and demands for recreation without giving a lot of thought on how we are going to sustain these activities and make them compatible with the long-term health of the environment. We have a growing array of recreational pursuits, with an increasing number of participants—using 21st century technology—on a road and trail system designed 40-80 years ago to fight fires and extract commodities.

In some places, the trail and road systems used by today's recreationist appear to be under-designed, inappropriately located, under-managed, and always under-funded. This is occurring at a time when recreation is becoming the primary use of public lands! The stage is set for substantial detrimental effects to natural resources including wildlife. My feeling on this is reinforced, every year, when I review the applications for trail maintenance grants and sit in on trail maintenance discussions.

In settling in on the Region's recommendation, I dusted off the (1970-1985) *Cooperative Elk Logging Study*, the most extensive wildlife research project ever undertaken by the Forest Service and the State of Montana. There are irrefutable findings in this study that roads—and motorized activities on them—impact elk. Likewise in twenty years of grizzly research, the impact of roads and motorized activity is clear. The activity changes the wild character of a piece of country, causes fragmentation, and displaces animals. The fragmentation analysis on Alternatives 2, 3, and 4 by the Wilderness Society in their 24-page comment is telling and hard to refute as is the award-winning, highly annotated document by the Montana Chapter of the Wildlife Society on the Effects of Recreation on Rocky Mountain Wildlife.

2. A second consideration is the business of recreation ethics, particularly as it applies the use of forest trails. Aldo Leopold said that, "We abuse land because

we regard it as a commodity that belongs to us.” It is not uncommon to see impacted stream banks and wetlands, shortcuts, pioneered trails, severe erosion, siltation, noxious weeds, parallel paths, impacted vegetation, and signs of human waste. The attitude seems to be, “...it’s ours, it is there to be used, we want and will use it however we can.” This reflects our independence and freedom and a historical utilitarian perspective. At a low level, this behavior is tolerated and accepted. At a higher level, if not tempered by a consideration of resource values, this behavior can result in permanent damage to natural resources, including wildlife.

Out of this reality we are seeing the emergence of a “recreation ethic” which advises the recreationist to travel lightly, avoid harm, and leave no trace. This behavior is promoted by giving people information about their natural resources, explaining appropriate conduct, and explaining the ramifications of inappropriate behavior. The hope is that as rational beings, we will then have reasons to treat the environment in a prudent manner.

This is still short of Aldo Leopold’s dream of seeing the land, “...as a community to which we belong (as opposed to a community that belongs to us).” A community which, “... we may begin to use with love and respect...” Leopold, in his 1948 preamble to *A Sand County Almanac*, said, “There is no other way for land to survive the impact of mechanized man, nor for us to reap from it (the land) the esthetic harvest it is capable, under science, of contributing to culture.”

Dick Taber, the former head of the wildlife program at the University of Montana and the University of Washington put it to me in a note this way, “...dedicated wildlife areas will produce their bounty forever if they are just taken care of.”

Aldo Leopold’s “land ethic” is the best-known environmental ethic of our time. “A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise.”

It’s possible to draw a line from the utilitarian perspective through the recreational ethic to Leopold’s land ethic and place ourselves on it. I think the public’s comments on this issue are ahead of both our agencies.

I think we are behind the technological curve when it comes to managing forest trail systems. I think we need to step back to catch up. We need to get the trail system in line with our resources, update our management, and wait for the land ethic to develop a little more.

3. FWP knows more about wildlife along the Front than any other comparable area (391,700 acres) in Montana. In 1998, Dr. Thomas Baumeister, FWP’s Hunter Safety Coordinator, put together a summary of reports pertaining to the Front and it totaled 177 references! The reports cited earlier add to this literature.

By all accounts, this is a rich wildlife area, part of a relative intact ecosystem. It is an area of unusual variety for this latitude. The single most telling fact I know comes from the informal six mile transect run by Pine Butte Preserve Manager Dave Hanna and Botanist Peter Lesicci from high up on Ear Mountain, east into the Pine Butte Preserve. That transect encountered roughly 700 plants—roughly one-third of the species found in Montana!

The reason the country is so rich is because the mountains, foothills, and prairie came together in a small piece of geography. Each habitat type supports a unique flora and fauna. The sum is unusual plant and animal diversity.

A relatively stable ranching tradition, thin soils, rough winter weather, periodic high winds, low precipitation, blocked-up public lands, critically placed private lands, generally good stewardship, a land ethic oriented to the future, and a long-haul conservation effort have allowed the Front to remain relatively intact.

Fragmentation caused by roading, rural subdivisions, conventional mineral development, and abusive recreation practices are the main perils.

4. Since at least 1975, wildlife biologists have used the term “Northern Continental Divide Ecosystem” (NCDC) to describe the area used by a continuous population of grizzly bears in northwest Montana. Northern Divide Grizzly Bear Project biologist Kate Kendal recently mapped an area of 7,866,857 acres (perimeter 658 miles) as the current range of this bear along the Continental Divide.

The heart of this Ecosystem includes the wilderness areas of Glacier National Park (1,013,572 acres) and three USFS Wilderness Areas: Bob Marshall (1,009,356 acres), Great Bear (286,000 acres) and Scapegoat (239,596 acres).. Roughly one-third of the NCDE is private land. The balance is Federal, state, or tribal property managed by six Federal, two State, and two tribal organizations.

In recent years, the NCDE has become the “basic unit” FWP considers in its management responsibilities. It is analogous to the Greater Yellowstone Ecosystem.

Your Travel Plan issue covers the 391,000-acres of the Rocky Mountain Ranger District. This amount of land, as big as it is, is about 5% of the NCDE and about 2% of FWPs Region 4 administrative unit. The trails, roads, motorcycle routes, and snowmobile paths involved are less than 1% of what is available in northcentral Montana.

With Alternative 3, all wildlife values will be enhanced. In the long-term, hunters and anglers will be better served. There will be 477 miles of trails available for non-motorized recreation and 88 miles of roads and trails available for motorized

recreation. Fourteen trailheads will be available for hunter access. Game carts and bicycles will be permitted where allowed in the past and 23% of 391,700 acres will be within a mile of motorized access.

SPECIFIC SUGGESTIONS

- **Roads and Trails**—We now have more roads and trails than we can afford to maintain in Montana, on public lands, on the Lewis and Clark Forest. All levels of government seem to have problems marshalling the resources needed to decommission surplus roads, maintain bridges, keep roads bladed, address dust problems, control erosion, keep weeds down, etc.

Your EIS does a good job summarizing mileage figures and the impacts of the various alternatives. What would be helpful in the final EIS is a District plan to address trail and road maintenance and a priority list for decommissioning, restoration, relocation, bridgework, etc.

- **Weed control**—Some concern was expressed that if motorized activity was excluded on certain roads and trails, 4-wheelers could not be used to control weeds.

Noxious weeds are a statewide problem and every natural resource agency is committed to controlling weeds and, where possible, eradicating them. While we do not condone the forever spraying of weeds year-after-year, we do understand the importance of chemicals in an integrated weed management program, in which weeds are mapped and control monitored and annually reported.

Outside of “wilderness”, we think every agency has the authority to “except 4-wheel use” on closed trails and roads in the spring and early summer when such control is most effective. Summer weed pulling and insect placement crews could also enter non-motorized, non-wilderness areas with motorized equipment as needed.

- **Badger-Two Medicine Unit**—This remains the most abused and impacted area on the Rocky Mountain District. This area has more evidence of trail pioneering and cross-country OHV activity than any of the other units. Work still needs to be done to explain the 2001 National Policy prohibiting such activity on National Forest lands.

Several times during the last two summers, our Conrad game warden has observed high performance motorcross bikes in the area. The riders were using this area for racing and hill-climbing activities. This is a new, fast-growing activity that is incompatible with the area’s cultural and wildlife goals.

The Badger-Two Medicine unit is the home of the best native cutthroat fishery on the Lewis and Clark Forest. Our fishery biologists hope to stabilize this population, build it up and use these fish in an East Front restoration program. The issue of cutthroat listing is still being litigated and the animal remains a State Species of Special

Concern.

We note your work on the White Rock Pass trail relocating the first two creek crossings and are grateful for this National Forest response. We have also been impressed with the work of your OHV Trail Ranger Jeremy Franks and his supervisor Kraig Lang. FWP has placed a high priority on your FY 2006 OHV Grant Application to continue and expand this aspect of your program.

We note this area has suffered during the seven year drought from overgrazing in the riparian zones, aspen stands, and whitebark pine stands. It may have something to do with the size of the allotment or the number of operators. The number of AUMs may be OK but the way it is grazed causes as many problems as the motorized activity

- Bighorn Sheep—These animals are very sensitive to the presence of humans. Our biologist, Quentin Kujala, is very concerned about the bighorns on the Fairview Plateau. Alternative 3 addresses our concerns. If another Alternative is selected, we would like to discourage motorized activity on Trail 204 off the Benchmark on Willow Creek roads.
- Connectivity to the Sun River WMA—Again, Alternative 3 addresses our long-standing concern about the elk migration routes to the Sun River Wildlife Management Area. We support the current fall management of the Beaver/Willow Creek road and hope in any scenario you select will minimize motorized activity immediately west of the game range.
- Open vs. Closed—The old Forest Service Travel Manual used to state that everything was open unless it was posted closed. Today's thinking is just the opposite: everything should be regarded as closed to motorized activity unless it is posted open. Posted with "open signs" is a more positive approach and cuts down on the confusion and vandalism that comes with "closed" signs.
- Enforcement—All regulation requires some degree of enforcement. Whatever Alternative is selected, there must be an enforcement presence in the field and information and education work done to explain the changes. July and the opening of stream fishing and hunting seasons are times to focus on these activities. FWP will try to help.
- Falls Creek/Dearborn Grizzly Country—We were glad to see Alternatives 2, 3, 4, and 5 all address recreation activity in this area. Something has caused a reduction of grizzly bears along this portion of the Front. Bear Specialist Mike Madel has noticed a drop in incidents, observations, bear density, and females with cubs. The drop has occurred over the last ten years and is reflected in the early runs of Kate Kendall's DNA Survey. This decrease may have had something to do with the salvage logging and road building that took place following the 1988 Canyon Creek fire. Some of the

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new roads put in are still being used.

- Blackleaf Country—Trail #191 in back of the northwest corner of the Blackleaf Wildlife Management Area is an important wintering area for deer and elk. Some of the Alternatives have it open for year around motorized activity. It is rare to see motorized activity now and no one seems to be pressing for the opening now. There are plenty of non-Forest roads in this area and we are hoping it can remain a quiet area, especially in the winter months.
- Cumulative Effects—For almost ten years, our two outfits talked about and worked on a cumulative effects model for grizzly bears in the NCDE. I was a little surprised you did not use it on your various alternatives. The results might have been helpful. I did read that you plan to use the model on the “preferred alternative.”
- ADA Concerns—I read carefully the section of the EIS on opportunities for disabled access. I have received two letters on this subject, both from avid hunters. I note in Alternative 4, you list the Hanna Gulch Road #240 for disabled hunter access. I am familiar with that road and intrigued by that idea along the Front. I support a trial of that concept.

CONCLUSION

I find the natural values of the Front so compelling that I think this very small portion of Montana should be spared the risk of unnecessary harm. I advocate limited motorized use in this area.

Thank you for the opportunity to comment. Good luck in the completion of your travel plan.

Sincerely,

Mike Aderhold
Region 4 Supervisor