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7 March 2013

Helena National Forest
2880 Skyline Drive
Helena, MT 59602

Re: Blackfoot Travel Plan

Folks:

Thanks for the opportunity to comment on the Helena National Forest's proposed travel plan for the Blackfoot watershed.

Montana TU supports Alternative 3 because unlike the preferred alternative it promises much greater restoration of damaged watershed conditions with not that much additional reduction in motorized access. For instance, Alternative 3 would reduce tons of sediment entering forest streams by an estimated 37.9 tons/year. Alternative 2 would reduce sediment contributions by only about a third of that. Many streams on the forest are sediment impaired, a number are listed on the State of Montana's 303 (d) list.

One federally listed fish species, bull trout, and another candidate species, westslope cutthroat trout, inhabit the forest in much lower abundance than what historically occurred. Both species are very sensitive to high turbidity and embedded sediment. It makes abundant sense to us that the forest should select an alternative that promotes the maximum amount of sediment reduction as practical. We note that Alternative 3 would be especially beneficial to reducing cumulative sediment contributions to several mainstem Blackfoot reaches, where pool frequency and the overwinter, security and thermal refuge benefits this habitat elements provides is critical and likely diminishing.

Alternative 3 also greatly benefits aquatic species because it reduces the amount of system road located within 150 feet of streams by 90 percent over Alternative 3 (34.4 miles versus 3.2 miles). Besides providing environmental benefits, it is likely that the long-term O & M costs to the forest would be greatly reduced because periodic drainage work or surfacing would not be needed. Finally, Alternative 3 is superior to the preferred alternative because it targets 121 stream

crossings for removal, in comparison to just 17 – thereby significantly reducing erosion risk, passage for aquatic species and long-term maintenance costs.

The significant bump in value for maintaining and restoring water quality, fish habitat and populations of aquatic species that Alternative 3 represents in contrast to the preferred alternative requires an additional reduction in roads of less than 15 percent – 307 miles compared to 347. Further, critical reaches of the mainstem Blackfoot, and important tributaries such as Alice Creek and Poorman Creek – the latter which our local chapter has invested in much in habitat restoration – would especially benefit. It makes abundant sense to us that Alternative 3 should be selected because of its superior value to watershed health and aquatic species. It's also important to note that Alternative 3 is superior to the preferred alternative because it assumes much less risk of weed spread, thereby benefitting watershed health, terrestrial species and forest's weed control costs.

We recognize that other values are of concern on this landscape, including big game hunting opportunities. That's why we are puzzled why the Forest is recommending modifying its elk security standards in this plan. The forest justifies this by implying potential reduced security shouldn't be that significant because elk populations in the upper Blackfoot region are above State of Montana objectives. However, the EIS does not document exactly why the elk herd exceeds objectives. It seems to conclude the reason is because the elk are too secure. If this is a problem, it makes more sense for state wildlife managers to re-evaluate their objectives, and to perhaps either increase the objective, or, through regulation, increase incentives that promote additional harvest. Reducing elk security makes little sense, especially if it risks contributing to other adverse effects, such as perpetuating open-road densities that contribute sediment to streams.

We also recommend the forest not allow vehicles to drive off legal routes for camping or game retrieval. This only invites law enforcement headaches and additional costs to the agency. Similarly, all Inventoried Roadless Areas should be managed as non-motorized to maintain a balance of recreational opportunities within the Blackfoot landscape, where most of the front country is already laced with roads. This also helps ensure headwater tributaries are better protected and risk of weed spread reduced.

Thanks for the opportunity to comment. We look forward to our views being acknowledged in the record of decision.

Sincerely,

A handwritten signature in black ink that reads "Bruce Farling". The signature is written in a cursive, slightly slanted style.

Bruce Farling
Executive Director

