



Last Chance Backcountry Horsemen Chapter (LCBCH) of Montana Backcountry Horsemen Comments on the **Helena-Lewis and Clark Forest Plan Revision Proposed Action:**

### **Continental Divide Trail Corridor Protection (forest wide)**

The Proposed Action includes a far-sighted proposal for conserving natural, scenic, historic and cultural values of the Continental Divide Trail Corridor. The CDT corridor –vital to wildlife-- will be protected from new roads, motor vehicle use, and oil and gas development across the entire Forest, encompassing 273 miles. Wild areas surrounding the CDT that offer “solitude, immersion in natural landscapes and primitive outdoor recreation” are protected.

LCBCH enthusiastically SUPPORT the Proposed Action to protect the CDT Corridor.

### **Divide, Upper Blackfoot Geographic Areas Helena and Lincoln Ranger Districts**

**Nevada Mountain Recommended Wilderness** (38,233 acres) The heart of the largest wild area along the Divide south of Highway 200 is recommended for wilderness protecting outstanding habitat for grizzlies, elk, wolverine, lynx, marten, lions, black bear, bobcats and moose. (Nevada Mountain straddles the Divide and Upper Blackfoot Geographic Areas in the planning process.)

We strongly SUPPORT the Proposed Action with two recommended modifications:

1. To provide a high-quality Lincoln-CDT trail, open to mountain bikes, designate the Stemple-Baldy Trail (18.8 miles) as proposed by IMBA Trail Solutions outside recommended wilderness, or another suitable alternative that would achieve this same goal.
2. Extend recommended wilderness east to fully protect the beautiful, remote Deadman Creek watershed wrapped by the Continental Divide.

### **Divide Geographic Area (202,577 acres)**

**Electric Peak** Recommended Wilderness (29,000 acres) and Non-Motorized Backcountry Area (33,000 acres). In the trout and wildlife-infested headwaters of the Little Blackfoot, Recommended Wilderness is imbedded within a larger Non-motorized Backcountry, which protects wild habitat and offers quiet backcountry trails for mountain bikes, foot and horseback. We strongly SUPPORT the Proposed Action.

**South Hills Special Recreation Area** (50,000 acres) The Forest Service proposes a special recreation area extending from the South Hills to the Continental Divide. Motor vehicles must remain on roads, and trails are managed for quiet recreation including, mountain bike, foot, ski and stock. The Area includes three key wild lands, Lazyman (Black Mountain), Sweeney Creek, and Jericho Roadless Area, as well as the Continental Divide Trail. We SUPPORT the Proposed Action with additional protections for wild lands such as:

Goal statements should be added to effect that no new trails should be constructed in wildlife security areas or Inventoried Roadless Areas (IRA) unless it can be clearly established that wildlife or roadless characteristics will not be negatively impacted. There should be companion goal statements in the wildlife, trails, and recreation sections to this same effect. We would like to see this same emphasis given to all GAs forest-wide. In addition, any non-system or un-authorized trails that are discovered should be reclaimed as soon as possible. Again, this should be a forest-wide goal.

### **Upper Blackfoot Geographic Area (333,215 acres)**

Along the Continental Divide, a series of four majestic wild areas between Stemple and Lewis and Clark Passes are proposed as “Semi-Primitive Non-Motorized” Backcountry allowing travel by foot, stock and mountain bikes, but no roads or motor vehicles.

We SUPPORT the Proposed Action with one improvement:

1. Classify all CDT wild lands and the Lewis and Clark National Historic District (Alice Creek) as “unsuitable” for oil and gas leasing.

### **Scapegoat Wilderness Inclusions**

Silver King, Red Mountain and Arrastra Creek (30,686 acres) are recommended for inclusion in the adjoining Scapegoat Wilderness. Six wilderness portal trails, from Arrastra to the CDT traverse lonesome basins, rugged ridges and grizzly-inhabited wild country. These trails are managed for traditional foot and stock uses.

These wild lands harbor some of the most vital grizzly habitat in the nation.

We strongly SUPPORT the Proposed Action.

## **Big Belts Geographic Area (312,983 acres)**

**Recommended Wilderness:** The PA recommends two areas for future wilderness:

- Big Log Inclusion in Gates of the Mountains Wilderness (7,109 acres)
- Mount Baldy-(Edith) Recommended Wilderness (14,298 acres)

However, the Proposed Action fails to recommend wilderness for Camas Creek (29,168 acres), largest, wildest candidate area in the Big Belts.

## **Non-Motorized Backcountry Areas**

The draft fragments and shrinks (Semi-Primitive) Non-Motorized Areas, reducing wild habitat, high quality quiet recreation and manageability in five key wild land areas.

- We Support protection of **Camas Creek** as Recommended Wilderness.
- We Support expansion of Non-motorized Backcountry Areas to fully protect these roadless areas: **Devil's Tower, Middleman-Hedges (Beartrap), Cayuse, Irish Gulch and Grassy Mountain.**
- We support adding Goal statements to effect that no new trails should be constructed in wildlife security areas or Inventoried Roadless Areas (IRA) unless it can be clearly established that wildlife or roadless characteristics will not be negatively impacted. There should be companion goal statements in the wildlife, trails, and recreation sections to this same effect. We would like to see this same emphasis given to all GAs forest-wide. In addition, any non-system or un-authorized trails that are discovered should be reclaimed as soon as possible. Again, this should be a forest-wide goal.

## **Elkhorns Geographic Area (160,599 acres)**

The Proposed Action continues management of the Elkhorns as a unique Wildlife Management Unit (WMU). However, it fails to protect the wild core of the Elkhorns and fails to ensure the WMU can never become an oil and gas field.

We very strongly Support stronger protection for the Elkhorns WMU including:

- Protect the wild roadless core of the Elkhorns by establishing Goal statements to effect that no new trails should be constructed in wildlife security areas or Inventoried Roadless Areas (IRA) unless it can be clearly established that wildlife or roadless characteristics will not be negatively impacted. There should be companion goal statements in the wildlife, trails, and recreation sections to this same effect. . In addition, any non-system or un-authorized trails that are discovered should be reclaimed as soon as possible. Again, this should be a forest-wide goal.

- We feel the Proposed Action clearly mis-identifies ROS opportunities. The core area IRA currently provides a Primitive ROS experience. Roads in the Tizer Basin core area should be shown with corridors, not actually impacting larger areas. In the northwestern part of the Elkhorns, near Strawberry Butte, the ROS really offers more of a Rural experience, not semi-primitive non-motorized.
- Mechanized use should be restricted to “system” trails in areas that are appropriate for that use. This should also be forest-wide direction.
- Ensure the Elkhorns WMU is classed “unsuitable” for oil and gas leasing
- Require reclamation of new mining roads and facilities in the WMU