



**MONTANA WILDERNESS
ASSOCIATION**

**A Guide to Commenting on the Missoula BLM Field Office
Draft Resource Management Plan (RMP)**

From the last remaining unroaded, wildlife secure habitat in the Garnet Range to geologic formations in the Drummond area, and productive lands in the Rock Creek corridor that are adjacent to Forest Service recommended wilderness, the Missoula BLM Field Office stewards highly unique and dwindling western Montana habitat. Our hope is that this guide gives you a sense of the values and character of these areas and encourages you to get out and experience them on your own in addition to providing comment to the BLM through the draft public comment process. We've included the recommendations that Montana Wilderness Association (MWA) will offer the BLM. Please join us in making the same recommendations.

Comments must be submitted before midnight on Thursday, August 15th.

The Missoula Field Office has released three draft RMP alternatives, which are summarized in the below table.

Summary of Missoula Field Office Draft RMP Alternatives

Alternative	Management Recommendations		
	ACECs	LWCs	WSAs
A	3 areas (1,225 acres)	0 areas/acres	3 areas (23,480 acres)
B	1 area (640 acres)	0 areas/acres	3 areas (23,480 acres with specific direction for management if released from WSA status)
C	2 areas (660 acres)	3 areas (2,523 acres)	3 areas (23,480 acres with specific direction, different than Alt. B, for management if released from WSA status)

Alternative B is the BLM's preferred alternative. **MWA supports some elements of Alternative C and its emphasis on wildlife habitat and riparian conservation and restoration.** Continue reading for the full range of MWA's recommendations for the Missoula RMP.

Wilderness Study Areas (WSAs)

There are three wilderness study areas managed by the Missoula Field Office. While this plan will not change management of these areas, as the BLM is mandated to



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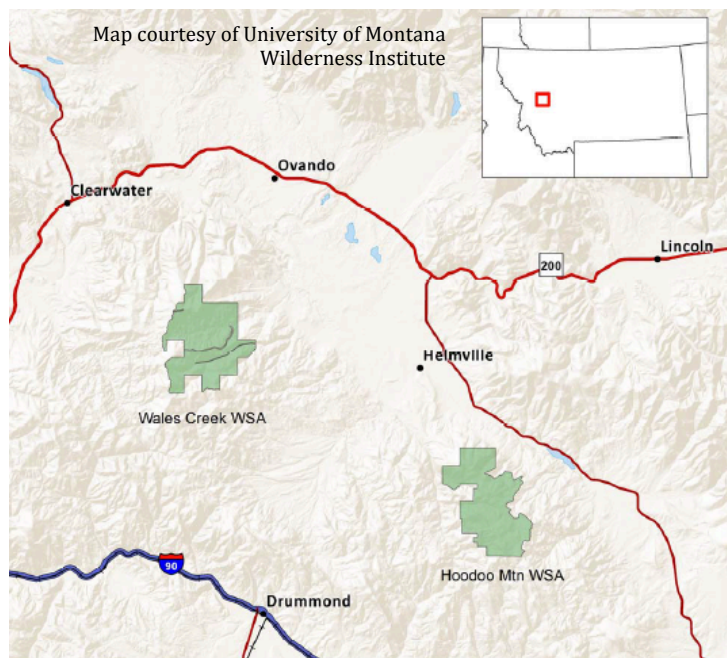
maintain management that does not impair the areas' suitability for preservation as wilderness, the RMP does set management direction for these areas should legislative action remove them from consideration for wilderness designation. Now is the opportunity to make sure that management direction provides maximum protection for these large, primarily unroaded areas.

Winter motorized access has been allowed in the Missoula Field Office WSAs to this point. Alternatives B and C of the draft RMP eliminate winter motorized WSA access. **MWA recommends** acknowledging and applauding this restriction and encouraging its retention in the final RMP.

Hoodoo Mountain WSA

Hoodoo Mountain is on the eastern edge of the Garnet Range between Helmville and Avon. Common recreational uses include walk-in hunting, fishing, hiking, and wildlife watching. Adjacent to Hoodoo Mountain is the Gallagher Creek area, which MWA has found possesses wilderness characteristics sufficient for Lands with Wilderness Characteristics classification.

If Hoodoo Mountain were released from consideration for wilderness designation, **MWA recommends** that the BLM plan to manage all 11,380 acres as a BCA. A backcountry conservation area is a large area of generally intact and undeveloped lands that contain functional, unfragmented habitats and migration or movement corridors for recreationally important fish and/or wildlife species. A BCA is managed to provide for high-quality wildlife-dependent recreation associated with those fish and/or wildlife species.



Wales Creek WSA

Wales Creek is known for its intact forest habitat that provides excellent wildlife security. As a result, it's a favorite destination for hunters seeking solitude and large game. The wet meadows along Wales Creek are especially productive for beaver and moose. The Wales Creek area also is home to a rare population of western pearlshell mussels. This population is one of only 20 in Montana and is ranked the second



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most important to sustaining this species. Wales Creek is the largest remaining unroaded area in the Garnet Range.

If the Wales Creek WSA were released from consideration for wilderness designation, **MWA recommends** managing 5,602 acres of Wales Creek as an area of critical environmental concern (ACEC) to protect secure habitat for the western pearlshell mussel, and managing the remaining 5,978 acres as a backcountry conservation area (BCA) in order to minimize future potential for changing its unroaded character and to protect secure habitat for elk, deer, bear, and moose.

Quigg West WSA

Quigg West is in the Rock Creek corridor west of Philipsburg. It is notably adjacent to the 77,000 acre Quigg Inventoried Roadless Area of the Lolo and Beaverhead-Deerlodge National Forests, the vast majority of which is managed as Recommended Wilderness. The dense vegetation and steep slopes that characterize this area provide year-round habitat for bighorn sheep, elk, and mule deer.

If Quigg West were released from consideration for wilderness designation, **MWA recommends** that the BLM plan to manage these 520 acres as a BCA.

Lands with Wilderness Characteristics (LWCs)

BLM's Lands with Wilderness Characteristics is a label applied to areas that possess sufficient size, naturalness, and outstanding opportunities for either solitude or primitive and unconfined recreation. LWCs are not a management designation, however, but are instead an inventory status. This means that LWCs are not equivalent to the Forest Service's recommended wilderness, but instead are a closer analogue to inventoried roadless areas (IRAs).

In 2014, the Missoula Field Office inventoried 58,929 acres in 10 separate units to determine whether LWC status was appropriate. The BLM found that three areas possessed the necessary characteristics: three tracts adjacent to the Wales Creek WSA (1,749 acres), one tract in the Chamberlain Meadows area (615 acres), and the Stoney Mountain Tackon (159 acres). All three of these areas are recommended as LWC in Alternative C. **MWA recommends** that the BLM recognize all of these tracts as LWCs in addition to the following: Hoodoo Mountain, Quigg West Tackon, Quigg East Tackons (3,730 acres), Nevada Mountain (102 acres), and Gallagher Creek (4,257 acres). In order to protect the wilderness characteristics present, **MWA recommends** management prescriptions for these areas include:

- Visual Resource Management Class I: level of change to the characteristic landscape should be very low and must not attract attention
- Closed to motorized and mechanized use



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- Prohibit construction of new permanent and temporary roads
- Vegetation treatments must utilize the minimum tool necessary
- Closed to renewable energy development
- Right-of-way exclusion area
- Closed to solid mineral leasing and saleable minerals
- Retention of federal ownership

Areas of Critical Environmental Concern (ACECs)

A BLM Area of Critical Environmental Concern (ACEC) is an area where special management attention is needed to protect important historical, cultural, and scenic values, or fish and wildlife and other natural resources.

There are three Missoula Field Office areas currently managed as ACECs. **MWA recommends** that the BLM continue to manage all three of these areas as ACECs.

Limestone Cliff

This area was recognized as an ACEC for its geology and education values. The limestone cliffs are a well-exposed outcrop of Madison limestone of Mississippian age. The accessibility, outcrop exposure, and structure make it an ideal learning location for educational groups and the site is frequently used by University of Montana field courses. **MWA recommends** retaining all of the current restrictions for this area: closed to motorized use, unavailable for planned timber harvest, and fire suppression limited to hand lines only. Grazing and withdrawal of minerals is allowed.

Phil Wright Rock

This area was recognized as an ACEC for its high value wildlife, watershed, recreation, and scenic features. These include valuable bighorn sheep range, important bighorn sheep lambing area, valuable elk, deer, and bighorn sheep winter range, excellent raptor nesting habitat, quality fishing opportunities in Rock Creek, and high quality scenic values afforded by the cliff complex that overlooks Rock Creek. **MWA recommends** continuing to recognize the Phil Wright Rock area as an ACEC. Currently all draft RMP alternatives recognize Phil Wright Rock as an ACEC.

Bear Creek Flats

This area was recognized as an ACEC for its high value wildlife, watershed, recreation, and scenic features. These include two miles of Blackfoot River river frontage and all associated recreation, wildlife, and riparian values, important bull trout spawning and rearing habitat in Bear Creek, 40 acres of old growth ponderosa pine, and big game winter range for elk, deer, and moose. **MWA recommends** retaining all of the current restrictions for this area: closed to motorized use, no development of recreation sites, and utility corridor avoidance.