

EXAMINATION OF THE FOREST PLAN REVISION PROCESS IN REGION 1

HEARING

BEFORE A

SUBCOMMITTEE OF THE
COMMITTEE ON APPROPRIATIONS
UNITED STATES SENATE
ONE HUNDRED NINTH CONGRESS

FIRST SESSION

SPECIAL HEARING

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EXAMINATION OF THE FOREST PLAN REVISION PROCESS IN REGION 1

FRIDAY, DECEMBER 2, 2005

U.S. SENATE,
SUBCOMMITTEE ON INTERIOR AND RELATED AGENCIES,
COMMITTEE ON APPROPRIATIONS,
Missoula, MT.

The subcommittee met at 10:30 a.m., at the University of Montana, College of Technology, 909 South Avenue West, Missoula, MT, Hon. Conrad Burns (chairman) presiding.

Present: Senator Burns.

OPENING STATEMENT OF SENATOR CONRAD BURNS

Senator BURNS. We'll get things all settled down here. It's 10:30 in the morning, and that's the witching hour. We like to start on time, and then we like to move out on time.

Thank you very much for coming. I want to thank the witnesses for coming this morning to testify before this panel. We had a couple of colleagues of mine that were going to come out, and they took a look at the weather and one of them cancelled a week ago and the other one cancelled this pretty quickly. I guess they're not as tough as us in Montana.

They took—I can't imagine what it would be like in Washington, DC, if we had these kind of conditions. We live in an area back there that they'll cancel school on a forecast. It doesn't have to be doing anything.

So, but nonetheless, we will get on. But I will tell you that the record will be reviewed by everybody on the committee. This is an oversight hearing of appropriations, and we have several of the stakeholders here as we are looking at the subject of Forest Planning in Region 1 of the Forest Service.

The Chief of the Forest Service is with us here today, Dale Bosworth, right down in center field, and we appreciate you being here. We have Charles Keegan from the University of Montana; Sherman Anderson, of course, president of Sun Mountain Lumber Company; John Gatchell, conservation director from the Montana Wilderness Association; John, thanks for coming today. I know you've got another event going on in Billings, and so I appreciate you making the effort of being here today.

Russ Ehnes, executive director of the National Off-Highway Vehicle Conservation Council and Mike Hillis, wildlife biologist for Ecosystems Research Group. We appreciate all of the witnesses being here today.

The National Forest Management Act requires that each forest within the National Forest System revise its forest plans every 15 years. The plans guide how the various parts of each forest will be managed. In Montana, the Forest Service is currently working, or will commence in 2006, five different forest plans on the Beaverhead-Deerlodge, on the Flathead, Lolo, Bitterroot and Kootenai National Forests. The combined area of these forests is over 11.1 million acres and, the management decisions made in these plans and revisions are all critical to us who live here in the State of Montana.

As the chairman of the Appropriations subcommittee that controls the purse strings of the Forest Service, I have criticized the forest planning process in the past as being sometimes overly complex and expensive. Currently, the Forest Service spends 6 to 7 years and several million dollars by providing these plans every 15 years.

So I'm pleased the Forest Service recently issued new planning rules that are designed to make the planning process faster and less expensive. With the exception of the Beaverhead-Deerlodge, the remaining forests in Region 1 will be revised under the new rules. In my view, making this process more efficient means that the excessive amounts that were being spent on planning can now be spent on reducing our hazardous fuels, treating our acres for invasive weeds and addressing the bug infested timber stands that are now common throughout the West. It is also important that adequate public involvement is maintained in the revision process, and I will keep a watchful eye on that to ensure that this happens.

While I'm pleased the Forest Service is trying to become more efficient in its planning process, I have several concerns about this process and how it moves forward. Unlike other Federal management agencies, the Forest Service has a multiple-use mandate, and it's not clear to me that the Agency is following this mandate in its recent work on forest plans here in Montana.

For example, in the draft environmental impact statement for the Beaverhead-Deerlodge the Agency's preferred alternative would reduce the allowable sales quantity of timber from 40 million board feet to 9 million, a 78 percent reduction; increase in the number of wilderness acres from 174,000 to 249,000, a 43 percent increase, and impose many new restrictions on public access, particularly motorized vehicles like ATVs and snowmobiles.

Now, these numbers may be justified, and if they are, we'd like justification for those numbers. That's the only thing that we're questioning here is the justification for the numbers. So I find the proposals troubling if we don't have something or some way to backup those numbers and give us good, solid reasons why they should come out a lot different when they first went in.

I firmly believe that without a sufficient timber industry infrastructure in the State, we harm our State. We have to maintain a market place for wood fiber. We'll not be able to address the forest health crisis in our Nation's forests if we don't have an infrastructure.

I would tell you that in the current budget climate we have to rely on Government to pay the entire cost of cleaning up the national forest. Or, should we have another way to do this and do it

in an environmentally safe way, which provides jobs and is also healthy to rural communities?

I'm also concerned about additional wilderness recommendations. It's in the Beaverhead Plan, and I will tell you why. Whenever those recommendations are made, the Forest Service has a habit of managing these acres as wilderness, so we get de facto wilderness without Congress taking any action at all.

These designations limit the ability for many folks to enjoy the areas in the forests. Not everyone has the physical capability to access these areas without the help of motorized vehicles. It also limits the agency's ability to fight fires in these areas because motorized firefighting equipment is not allowed in those areas.

So it's my intention to explore these and other issues here today, get it on record and start the dialog as we complete these plans. They should be consistent on every forest, and there should be a standard operating system on how we make decisions with regard to our land management.

In closing, let me also add that I know the issues that we're discussing here are controversial and some of them are very emotional, and we have a lot of people here that represent a wide range of views. That is good, and I expect the people to express those views. But this is a hearing, and a hearing is where we get information on record and that's how we, as policy makers, make our decisions.

So let me also add that the record will be kept open until December 16, so any member or the public can submit comments and testimony that will be included in the record of this hearing today. Those comments may be submitted in my office here in Missoula. If you can provide these comments electronically as well as in written form that would be most appreciated.

So I appreciate the folks coming out today. We haven't had a good old-fashion winter in Montana in a long time. People have got to understand that we live in a part of the country that if it don't winter, it doesn't summer. So we are finally, maybe, getting back to some normality here in this part of the country.

So with that we will start off with our witnesses today. Now, witnesses, identify yourselves, because we have a court reporter over here, and he has a hard time sometimes identifying voices. So you always want to say who you are and also get your microphones into place so everybody can hear. We're going to start off with Dale Bosworth, who is Chief of the U.S. Forest Service.

Let me say up-front that we've worked a lot with the Forest Service and Dale and his office in Washington, DC, and under very difficult circumstances. They have to make some very difficult decisions. But nonetheless, Dale has been one Chief that I've really enjoyed working with because some way or another we cut through some of the red tape and solve some problems that should be solved.

So, Chief Bosworth, thank you for coming today, and we look forward—if you would keep your testimony to about 7 minutes—your full statement will be made part of the record and then we will have a little question and answer period, and we'll start a little dialog at the table and bring out some other issues. So, Chief, thank you for coming today.

STATEMENT OF DALE BOSWORTH, CHIEF, U.S. FOREST SERVICE, DEPARTMENT OF AGRICULTURE

Mr. BOSWORTH. Thank you, Mr. Chairman, and thank you for the opportunity to be here. It's always good to be back in Montana even if it's for a hearing. I really appreciate the opportunity to talk about forest planning, and the revisions here in Montana.

A series of legislative initiatives, dating back to 1960, including the National Environmental Policy Act and the National Forest Management Act would recognize the complex nature of managing natural resources for the American people and the changes that occurred to manage supply and societal values over time.

Forest and grassland plans identify the availability of lands and their suitability for resource management. The goal of this planning is sustainable use of natural resources as well as sustainable communities.

Five western Montana national forests now are currently in the forest planning revision process. All the forests with the exception of the Beaverhead-Deerlodge are revising their plans using the new 2005 planning rule. The Beaverhead-Deerlodge continues this revision under the 1982 rule since it had already completed this draft plan, which was ready for public comment at the time the new rule was published.

Region 1 is using a zone approach that recognizes the similar interests of communities within zones, along with their similar resources, ecosystems, and opportunities in order to spend planning dollars more efficiently.

The present Montana planning zones are the Kootenai National Forest and the Idaho Panhandle National Forest, which has some land in Montana. The Western Montana Zone, which includes the Flathead, the Lolo and the Bitterroot, and then the Beaverhead-Deerlodge is a separate zone on its own.

We began land management planning under the provisions of the National Forest Management Act and the 1982 Planning Rule. We believed at that time that the early forest plans would provide the strategic framework for management of national forests.

We also believed that the plans had the necessary analysis and disclosure to implement forest management projects and activities. Through a series of legal challenges we learned that individual projects would need additional, extensive site-specific analysis.

New legislation regulations and case law changed the operating environment over time and those required changes to forest plans in order to bring proposed activities into compliance. The complexity of navigating through the process became very lengthy. It became very difficult. I've referred to it as the "process predicament," and the Forest Service faced many public challenges as we attempted to fit our management proposals into plans that were quickly becoming out of date.

Several attempts were made over the past decade to develop a new planning rule that would help better define the role of forest planning or streamline the process for responding to change and shorten timeframes. The current planning rule was adopted in January.

The new rules require the Forest Service to engage the public in a cooperative manner during the revision process and continue that

approach throughout the planning revision. The old planning process required analysis of several alternatives that displayed a range of management themes and levels of resource outputs.

Various interest groups would then align themselves with whichever alternative most reflected their concerns, and that left the Forest Service in the position then of trying to seek a compromise solution among all those variety of interest groups.

The collaborative approach does not focus on multiple alternative development, but rather on bringing communities together up front in the process to work together to find common themes and to find common interests.

Both communities of place and communities of interest play key roles in finding areas of agreement. Competing interests and some level of disagreement, we'll always have and they will continue as we move through the planning revision process.

I believe the level of polarization over our new process will be less than we experienced in the first round of forest planning. It's also important to understand that this public participation process requires everyone's energy, and it requires lots of patience.

Parties need to be at the table in order to have their concerns addressed, and since there are no alternatives developed under the new rule, the interests may have some difficulty in recognizing how their interests are addressed unless they remain engaged in the process.

The new generation of plans will allow adaptive management and changes based on consistent monitoring and evaluation. This continuous and proven methodology will be applied using processes that are internationally recognized.

The Forest Service will develop and implement environmental management systems (EMS) that require regular, cyclical planning, implementation, monitoring and review. The Northern Region, I think, is on the cutting edge of revising plans under the 2005 planning rule.

I'm really proud of the regional forester, Gail Kimbell, and the Region 1 employees as well as the public for embracing cooperative participation as evidenced by the involvement of resource advisory committees, of forest stewardship projects and other community interests. This concept of collaboration is more than just words on paper. It defines a new spirit of partnership of Forest Service and the communities that we serve.

Forest and Grassland plans revised under the 2005 rule will be strategic documents, and they'll focus on how the agency, working in concert with the public and other Government agencies, will manage the landscape to reach desired future conditions that are deemed to be beneficial to the socioeconomic and ecological attributes of the area, which is a part of communities and not apart from them. Instead of rules and standards focused on prohibition, the new approach centers on identifying and achieving desired future conditions.

Public scoping has identified many issues that will need consideration during the final revision process. While each forest and grassland has issues that are unique to that unit, there are issues that are common to all planning zones.

Three major key issues that appear throughout Montana national forests are: Lands generally suitable for timber harvest. Another one is lands proposed for wilderness designation, and the third one is lands generally suitable for motorized or nonmotorized use. These issues are going to continue to be among the most difficult challenges to developing collaborative solutions.

A highly debated and often misunderstood component of forest plans are the lands generally suitable for timber harvest. In the first round of planning, these were one category of lands identified solely with an eye to potential timber harvest.

This led to expectations that were never realized. We have legal, resource, socioeconomic and organizational factors that interacted to reduce the outputs. A primary goal for Region 1 under the new rule is to identify lands suitable for timber harvest, working with communities that result in expectations that can be met, that can be met reliably and are still ecologically sound.

The 2005 planning rule identifies two types of land uses for which the timber removal is suitable: That is lands generally suitable for timber production and lands generally suitable for timber harvest. There's a difference between those two.

The Forest Service has long recognized that the timber harvest is a viable tool to accomplish several management objects. Forest inventories have identified sites where silvicultural prescriptions can be applied to contribute to the demand for wood fiber while contributing revenue to the national treasury.

Forest plans are going to continue to examine and identify lands to be recommended to Congress for inclusion in the National Wilderness Preservation System. Communities and the public working collaboratively with the Forest Service will have the opportunity to participate in the identification of lands that the agency will recommend for wilderness designation.

Motorized versus nonmotorized travel and all the associated implications are undoubtedly among the most controversial challenges facing the Forest Service. I want to clarify what will be determined by forest plans and what will be determined outside the process.

The revised plans are strategic and will only identify lands that are suitable for motorized use and lands that are generally suitable for nonmotorized use. Forest plans will not make site-specific motorized and nonmotorized route decisions. The final travel management rule will guide forest and grasslands and decisions that designate specific routes. They'll be using a separate, public collaborative approach.

PREPARED STATEMENT

So, Mr. Chairman, the Forest Service is committed to an open and participatory forest plan revision process, and local communities will have a say in those decisions that directly impact them. So that concludes my statement, and I'll be happy to answer any questions. Thank you.

[The statement follows:]

PREPARED STATEMENT OF DALE BOSWORTH

Mr. Chairman, thank you for inviting me to talk with you today about the status of Forest Plan Revisions in the Northern Region 1 which includes all of Montana,

Northern Idaho, North Dakota and portions of South Dakota. I am accompanied today by Northern Region Forester, Gail Kimbell.

A series of legislative initiatives, dating back to 1960, has given us the Multiple-Use Sustained Yield-Act, the National Environmental Policy Act, the Forest and Rangelands Renewable Resources Planning Act, and the National Forest Management Act. These and other laws recognize the complex nature of managing renewable resources for the American people and the changes that occur in demand and supply over time. Forest and grassland plans—developed with the assistance of the public and interested agencies and groups—identify the availability of lands and their suitability for resource management. The goal of this planning is sustainable use of natural resources and sustainable communities.

Five western Montana National Forests, as well as the three Idaho National Forests in Region 1, are currently in the revision process. All of the forests, with the exception of the Beaverhead-Deerlodge, are revising their plans under the 2005 rule. The Beaverhead-Deerlodge continued its revision under the 1982 rule since it had already completed its draft plan which was ready for public comment at the time the new rule was published. Region 1 has decided to accomplish the revision process by organizing the work in planning zones. This approach has been employed to recognize the similar interests of communities within the zone, similar resources and ecosystems, and opportunities to spend planning dollars efficiently.

The current planning zones are:

Clearwater—Nezperce Zone (Idaho)

Kootenai—Idaho Panhandle Zone (Montana/Idaho)

Western Montana Zone (Flathead, Lolo and Bitterroot NFs/Montana (includes a small portion of Idaho))

Beaverhead-Deerlodge (Montana)

We began land management planning under the provisions of the National Forest Management act and the 1982 Planning Rule. We were optimistic that the early forest plans would provide a strategic framework for management of the national forests. We also believed the plans had the necessary analysis and disclosure to implement forest management projects and activities. A series of legal challenges taught us that individual projects would need additional, extensive, site-specific analysis. Sometimes this added analysis developed new information that was not consistent with Forest Plan standards and guidelines, resulting in plan amendments. Furthermore, new legislation, regulations, and case law changed the operating environment over time, requiring additional changes to Forest Plans in order to bring proposed activities into compliance. The complexity of navigating through the process became very difficult—I've referred to it as process predicament—and the Forest Service faced many public challenges as we attempted to "fit" management proposals into plans that were quickly becoming out of date.

Several attempts were made over the past decade to develop a new planning rule that would help better define the role of the Forest Plans, streamline the process for responding to change, and shorten timeframes. The current planning rule was adopted in January of this year. The Forest Service is pleased that we can move forward with our revision processes. We are optimistic that the new rule will provide for a more efficient process and allow the agency to respond to change in a way that benefits forest and grassland management and communities.

The new planning rule provides for broad and continual public participation during the planning process and throughout the plans' implementation. The new rule requires the Forest Service to engage the public in a "collaborative" manner during the revision process and continue that approach throughout plan revision. The old planning process required analysis of several alternatives that displayed a range of management themes and levels of resource outputs. Various interest groups then aligned with whichever alternative most reflected their concerns. This left the Forest Service in the unenviable position of seeking a compromise solution among these interest groups.

The collaborative approach does not focus on multiple alternative development, but rather on bringing communities together "up front" in the process to work together to find common themes and to find common interests. It is a tangible expression of the kind of citizen involvement encouraged by so many at the recent White House Conference on Cooperative Conservation. Both communities of place and interest play key roles in finding areas of agreement. Competing interests and some level of disagreement will continue as we move through the plan revision process; however, I believe the level of polarization will be less than we experienced in the first round of forest planning. It is also important to understand that this public participation process requires everyone's energy and patience. Parties need to be at the table in order to have their input addressed. Since there are no alternatives de-

veloped under the new rule, interests may have difficulty recognizing how their interests are addressed unless they remain engaged in the process.

The 2005 rule allows forests, as they revise plans, to ensure they remain current and congruent with changes in the physical and social environment. New generation plans will allow “adaptive management” where they are consistently monitored, evaluated and updated. This continuous improvement methodology will be applied using processes that are internationally recognized. The Forest Service will develop and implement Environmental Management Systems (EMS) using the ISO 14001 Standard. The EMS process requires regular cyclical planning, implementation, monitoring and review. This process relies on application of the best available science and certified audits.

The Northern Region is on the cutting edge of revising plans under the 2005 planning rule. I am proud of Regional Forester Kimbell, Region 1 employees, and the public for embracing collaborative participation as evidenced by the involvement of Resource Advisory Committees, Forest Stewardship Projects, and other community interests. This concept of collaboration is more than just words on paper. It defines a new spirit of partnership of the Forest Service and the communities we serve.

Forest and Grassland plans revised under the 2005 rule will be strategic documents and focus on how the agency, working in concert with the public and other government agencies, will manage the landscape to reach desired future condition deemed to be beneficial to the social, economic, and ecological attributes of the area—a part of communities, not apart from them. Instead of rules and standards focused on prohibitions, the new approach centers on identifying and achieving desired future conditions. The plans will be revised with collaborative public participation and the best available science and identify activities necessary to reach those desired conditions over time. This process will allow continual monitoring to incorporate new technology, current and future scientific findings, and public input.

Public scoping has identified many issues that will need consideration during the collaborative process. While each forest and grassland has issues that are unique to that unit, there are issues common to all the planning zones, especially the forested zones. Three key issues that I want to address in this testimony are (1) lands generally suitable for timber harvest; (2) lands proposed for Wilderness designation; and (3) lands generally suitable for motorized and/or non-motorized use. These issues always generate controversy and will continue to be among the most difficult challenges to developing collaborative solutions.

A highly debated and often misunderstood component of forest plans are “lands generally suitable for timber harvest.” In the first round of planning, these were one category of lands, identified solely with an eye to potential timber harvest. This led to expectations that were never realized as legal, resource, socio-economic, and organizational factors interacted to reduce outputs. A primary goal for Region 1 under the new rule is to identify lands suitable for timber harvest, working with communities, that result in expectations that can be reliably met and are ecologically sound.

The 2005 planning rule identifies two types of land uses for which timber removal is suitable, “lands generally suitable for timber production” and “lands generally suitable for timber harvest”. The Forest Service has long recognized that timber harvest is a viable tool to accomplish several management objectives. Forest inventories have identified sites where silvicultural prescriptions can be applied to contribute to the national demand for wood fiber while contributing revenue to the national treasury. These lands, when harvested in an environmentally sound manner, are lands that will likely be identified as “generally suitable for timber production.” Other lands, where timber management is not the highest and best use, can still be harvested to help meet other multiple use objectives. Examples would be timber harvest that improves wildlife habitat, fire regime condition class and forest health can also produce timber products. In these areas timber harvest may be less economically efficient and would be incidental to other objectives. These lands would likely be identified as “generally suitable for timber harvest.” While the number of acres generally suitable for timber production may decrease in comparison to the old plans, the total acreage of lands generally suitable for timber production and timber harvest appear to be about the same. I want to emphasize that the collaborative process will determine which lands meet these objectives.

Forest Plans will continue to examine and identify lands to be recommended to Congress for inclusion into the National Wilderness Preservation System. Communities and the public, working collaboratively with the Forest Service, will have the opportunity to participate in the identification of lands that the agency will recommend for Wilderness designation. Region 1 has already been working collaboratively with communities and Tribal Governments to identify lands that have wilderness characteristics that make them candidates for recommendations to Con-

gress. Some plan revisions may recommend acres that are logical additions to existing Wilderness because of topographic boundaries, ecotypes, or other management considerations. Some will recommend new acres based on the land's suitability for wilderness designation. Other revisions may eliminate some areas that were previously recommended. Again, decisions will be made in a collaborative process with extensive community involvement. We will manage any lands recommended for Wilderness to protect wilderness values. These preliminary administrative recommendations will receive further review and possible modification by me, by the Secretary of Agriculture, or by the President. Congress has the authority to accept these recommendations when deliberating on wilderness designation.

Motorized versus non-motorized travel, and all the associated implications, are undoubtedly among the most controversial challenges facing the Forest Service. I want to clarify what will be determined by forest plans and what will be determined outside the revision process. The revised plans are strategic and will only identify lands that are generally suitable for motorized use and lands that are generally suitable for non-motorized use. Forest Plans will not make site-specific motorized and non-motorized route designations. The Final Travel Management Rule will guide forests and grasslands in decisions that designate specific routes, employing a separate public collaborative approach.

Mr. Chairman, the Forest Service is committed to an open and participative forest plan revision process. Local communities will have a say in decisions that directly impact them. The public at large will also be part of the plan revision process. Again, I want to emphasize that collaboration does not have a specific beginning and ending. Instead, it is a continual process where the public works with the Forest Service to determine what benefits the land and people. Collaboration continues beyond plan revision and includes public participation in monitoring as well as audits to ensure we are moving toward the desired condition and examining the need for change. It won't always be neat and tidy, but it will always be the right thing to do. I am encouraged by how people in Idaho, Montana and the Dakotas are engaging in collaborative efforts. Tribal, State and Local Governments are working with federal agencies and the public on natural resource issues at unprecedented levels. I see approved revised plans not as a point of completion, but a starting point where community relationships will be the catalyst for land management decisions that have local and national acceptance. This concludes my statement, I am happy to answer questions.

Senator BURNS. Thank you very much, Chief. I appreciate that.

Now we have Charles Keegan who is with the Bureau of Business and Economic Research of the University of Montana, and Professor Keegan, or Mr. Keegan, or Charlie, it's nice to see you.

STATEMENT OF CHARLES KEEGAN, DIRECTOR OF FOREST INDUSTRY AND MANUFACTURING RESEARCH, BUREAU OF BUSINESS AND ECONOMIC RESEARCH, SCHOOL OF BUSINESS ADMINISTRATION, UNIVERSITY OF MONTANA

Mr. KEEGAN. Thank you, Senator. I answer to those and many other monikers as well. For the record, I'm Chuck Keegan, director of Forest Industry and Manufacturing Research in the Bureau of Business and Economic Research at the University of Montana and also a research professor from the School of Business Administration at the University the Montana.

By way of some background information, my work for the past 28 years has focused on the structure and operations of the forest products industry in Montana and the other western States. For the past 15 years I've worked extensively on the financial feasibility of implementing new forest management regimes to deal with ecosystem restoration and fire hazard reduction.

This morning in my remarks dealing with the forest planning, I'd like to concentrate on the areas of economic activity, timber output and industry infrastructure. First of all, looking at economic activity, I want to look at employment and state that despite declines in Montana's forest products industry, it remains a substantial in-

dustry in the State directly employing some 9,000 to 10,000 people primarily in high-paying jobs with very good benefits.

In addition to that direct employment, there are at least an equal number in related sectors, many of which also are high-paying jobs. As the Senator is well aware, these jobs are especially important in a relatively low-wage State like the State of Montana.

A less obvious but important aspect of Montana's forest products industry is one that has been alluded to by the Senator and by the Chief of the Forest Service and that is to provide the wherewithal to manage forest lands in an ecologically and financially responsible manner.

This wherewithal includes the workforce and sophisticated equipment needed to perform forest treatments in a cost-effective manner found in Montana's logging industry and in the milling infrastructure to utilize and add value to timber harvested either as a commercial product or as a by-product of treatments.

Before I get into some very little detail on the infrastructure, let me offer some general thoughts on timber product output from the national forest lands.

Looking at inventory statistics it's clear that some national forest lands in Montana are very productive from a timber growing standpoint and also have other characteristics that warrant management for commercial timber production. This, in my opinion, should be recognized in the forest plans, and it sounds like from the remarks of the Chief that that will be recognized in the forest plans.

Timber production should be identified as an expected output from those appropriate national forest lands, and estimates of timber harvest volumes from appropriate lands should be provided in forest plans.

Having said this, however, I believe that the real opportunity to produce substantial timber volumes and in particular additional volumes of timber from national forest lands in Montana is as a by-product of properly done treatments aimed to deal with ecosystem and fire hazard problems which exist on literally millions of acres of forest land in Montana and the other western States.

Now, a bit more about timber processing and the infrastructure in the state, which, as I indicated, is a key to efficiently performing many of these needed treatments. Despite the losses, Montana still has a substantial and diverse forest industry infrastructure in place. While individual timber processors and loggers have continued to make investments—and substantial investments as you will hear—unfortunately—I'm sure you will hear—unfortunately, Montana's timber processing capacity overall has been declining and declining precipitously over the past 15 years. Specifically, we have seen a loss in excess of 40 percent of the timber processing capacity in the State of Montana since the late 1980s from 1.5 billion board feet annually to just over 900 million board feet.

Much of this decline—not to pick on my friends from the Forest Service—but much of this decline has been clearly due to the very large 70 plus percent decline in the national forest timber sales, timber product outputs, over that period.

As we look to the future, it's clear from, at least our research, that further declines ranging from 5 to 20 percent and perhaps past 20 percent of current timber processing capacity are expected

unless the national forests substantially increase the output of timber.

The logging sector will also decline. I'm talking about the timber processing sector, but that would involve a decline in the logging sector as well as the milling residue processing sector and the use of wood fiber for fuel.

Then looking to the future: Maintaining efficient milling infrastructure in proximity to national forests will have, I believe, substantial benefits, and some of them have been mentioned. With adequate industry infrastructure and timber the high-paying jobs in the forest products industry can be sustained, and based on some of our analysis even increased.

The overall economic benefits, in addition to the jobs in the forest products industry, the overall economic benefits of improved forest ecosystem conditions, reduced fire hazard accruing from the ability to treat the forest can hardly be overstated and are so large that it's very difficult to put a value on those outputs. They include not only reduced firefighting costs but employment and incomes from other forest-based activities such as travel and tourism, not to mention the improvement in quality of life that all of us would enjoy if we had to deal with less smoke in Montana, periodically, for example.

Finally, relating some of our research directly to the forest planning process and addressing the area that you raised, Senator, on consistency among the forest plans, I can talk about a few of them. One particular area in which we have worked with the Forest Service planners in U.S. Forest Service Region 1 and individual forest planners in other regions, we have supplied the agency with information on the capacity of the forest products industry to efficiently process timber of various sizes for the areas surrounding each of the national forests. This capacity information, I have been informed, is being used in the planning process to evaluate—I'll wrap up in just a second.

Senator BURNS. Turn that button off. I think it woke me up a little bit.

Mr. KEEGAN. It confused me.

Senator BURNS. I think it confused the audience too.

Mr. KEEGAN. The capacity information that we have developed and supplied to Forest Service planning, it is my understanding, is being used in the planning process to evaluate the kind and quantity of timber the industry could use if that timber were made available.

I'm pleased to be able to do this and to have the forest using this kind of information. I think it will be very useful both in evaluating potential commercial timber sales as well as fuels and other ecosystem management treatments.

As an added thought I encourage the forests to identify steps that they might take to maintain the necessary timber harvesting and processing infrastructure that enables both forest management as well as social and economic goals of the communities immediately affected by the forests.

PREPARED STATEMENT

I want to thank you again for the opportunity to be here this morning and that concludes my remarks.

[The statement follows:]

PREPARED STATEMENT OF CHARLES E. KEEGAN

I am pleased to respond to Senator Burns' request for comments on the forest plan revision process and impacts on economic stability, public access, and commodity outputs. I will concentrate my remarks this morning on economic activity, timber output, and industry infrastructure.

Despite declines in Montana's forest products industry, it remains a substantial industry in the state, directly employing 9,000–10,000 people primarily in high paying jobs with very good benefits. In addition to the direct employment there are at least an equal number employed in related sectors many of which are also high paying jobs. These jobs are especially important in a relatively low wage state like Montana.

Montana's forest products industry provides the resources to manage forestland in an ecologically and financially responsible manner. These resources include the work force and sophisticated equipment needed to perform silvicultural treatments in a cost effective manner, and the milling infrastructure to utilize and add value to timber harvested as a by-product of treatments. The industry's ability to continue to re-invest in infrastructure is key to adequately treating the large acreages in Montana that suffer from forest health problems and unnaturally high fire hazard.

My testimony today will focus on infrastructure needs and losses in Montana's forest products industry and what continues to be an enormous missed opportunity. That missed opportunity is the very limited application of treatments to the literally millions of acres of forest land in Montana and the other western states needed to restore and sustain desirable forest ecosystem conditions. Associated with this ecological treatment need there is a very substantial economic opportunity, which our research indicates could result in positive revenue flow to landowners, increased treatment activity, and employment opportunities. If this opportunity is not realized we will see further degraded forest conditions and continued declines in the forest products industry.

TIMBER PRODUCT OUTPUT

Looking at inventory statistics, it is clear that national forest lands in Montana are very productive from a timber growing standpoint and have other characteristics that warrant management for "commercial" timber production. This should be recognized in the forest plans, timber production should be identified as an expected output from appropriate national forest lands, and estimates of timber harvest volumes from appropriate lands should be provided in forest plans.

Having said this, I believe the real opportunity to produce substantial additional volumes of timber products from national forest lands in Montana is as a by-product of treatments aimed to deal with ecosystem and fire hazard problems, and perhaps more broadly to mimic natural processes to avoid future problems.

MONTANA'S TIMBER-PROCESSING INFRASTRUCTURE

Montana has an industry infrastructure in place to harvest, process, and actually return revenue to landowners when wood is removed from forests as a by-product of restoration and fire hazard reduction treatments. Additional investment is needed by industry to stay competitive and more efficiently process the timber produced from these treatments. Unfortunately, while individual timber processors and loggers have continued to make investments, Montana's timber-processing capacity has been declining over the past fifteen years because of declining national forest timber sales.

Timber processing capacity refers to the volume of timber that could be used by mills that operate entirely on timber in round form. Recent analyses conducted by our organization indicate that:

- The number of medium and large mills in Montana has dropped in half from over 30 in the late 1980s to 15 today.
- There has been a more than 40 percent decline in capacity to process timber since the late 1980s from about 1.5 billion board feet annually to just over 900 million board feet.
- Much of this decline has been due to the very large declines in national forest timber sale volume.

Further declines—ranging from 5 to 20 percent of current timber processing capacity—are expected unless national forests substantially increase timber offerings.

I also need to mention users of mill residuals. Residue-utilizing facilities in Montana range from very large plants, a pulp and paper mill, to substantially smaller users producing decorative bark, fuel pellets, or using wood as fuel. A number of these facilities can and do use a mix of forest waste wood and mill residuals.

Because of declines in the sawmill sector the residue sector is facing a potential shortfall of wood fiber. At worst the shortfall could lead to one or more large residue facilities downsizing or closing, and at the least competition for wood residue would increase. Dramatically increased competition for a diminishing supply of residue could leave some users, such as new energy facilities, paying much more for their fuel than expected.

CONCLUSIONS

Maintaining efficient milling infrastructure in proximity to national forests will have substantial benefits. With an adequate infrastructure, high paying jobs in the forest products industry can be sustained and even increased—a particular benefit in many rural western areas. The overall economic benefits of improved forest ecosystem conditions and reduced fire hazard accruing from the ability to treat the forest can hardly be overstated. They include not only reduced fire fighting costs but employment and income from other forest based activities such as travel and tourism.

At the request of the Forest Service Region 1 and individual forest planners in other regions, we have supplied the agency with information on capacity and capability of the forest products industry to efficiently process timber of various sizes. This information is being used in the planning process to evaluate the kind and quantity of timber the industry could use if made available by the forest(s). I encourage the forests to identify steps they can take to maintain the timber harvesting and processing infrastructure that enables sound forest management as well as the social and economic goals of the communities immediately affected by the forests.

Thank you for this opportunity to comment.

Senator BURNS. Thank you very much. We've followed your work a lot, and you've done some great work here at the University of Montana.

Now we have Sherman Anderson, Sun Mountain Lumber, up in the Seeley/Swan country. We appreciate you, Sherman, for coming down today.

STATEMENT OF SHERMAN ANDERSON, PRESIDENT, SUN MOUNTAIN LUMBER COMPANY

Mr. ANDERSON. Honorable, Senator Burns, my name is Sherman Anderson, and I live in Deer Lodge, Montana—

Senator BURNS. Deer Lodge—

Mr. ANDERSON [continuing]. Located in—

Senator BURNS. Wolf Creek.

Mr. ANDERSON. I'd like to thank you for taking the time out of your busy schedule to make this long journey to Missoula and give us this opportunity.

I have worked in the timber industry all my life. My father was a small sawmill owner and a logger. About 30 years ago my father moved to Wyoming, and I remained at Deer Lodge to start my own business, Sun Mountain Logging. Two years ago we purchased the sawmill and finger jointing operations in Deer Lodge. At that time I could see the danger of the Deer Lodge plant becoming another closed facility as I have seen so many others before.

Sun Mountain Lumber, as it is now called, produces 2 by 4 and 2 by 6 studs. Our annual production capacity in the sawmill is 125 million board feet. Our finger jointing plant's—a value added facility—annual production capacity is about 100 million board feet. This is enough lumber to frame 20,000 American homes.

The role of our company in the local economy is paramount. As one of the largest employers in the Butte/Deer Lodge/Anaconda area, we provide liveable wages including total benefits capable of sustaining families and maintaining healthy lifestyles to our 290 employees. Our annual payrolls inject over \$12 million into the local economy directly through our employee wages.

As forestry professionals we as a company and as a viable industry are committed not only to responsible land stewardship but also to renewable and sustainable timber resource. This is a good business for the State of Montana. But as we continue to struggle to survive, we are reaching out longer distances, even into surrounding States to obtain the needed timber supply. Sadly, there are vast amounts of timber on Montana's national forests surrounding us that are dying or burning in catastrophic fires lying unused and going to waste.

On the Beaverhead-Deerlodge forest, the forest that's in closest proximity to our facility, they had estimated 151,000 acres of beetle kill in 2004. In the Butte District, less than 60 miles away from us, 2004 estimated beetle kill was 55,000 acres. Thus far only 2,100 acres have been proposed for some form of timber management out of the 55,000 acres. This is less than 3.9 percent of the estimated dead.

If, or more likely when, this watershed burns, the estimated cost to the city of Butte to install an adequate water filtration system would be \$15 to \$20 million at today's cost.

Now, in our downward trend it tells the story. Going back for 5 years, starting 2001, our volume under contract was 35 percent with the U.S. Forest Service, and now in 2005 this has dwindled to 5 percent U.S. Forest Service, 95 percent from other sources.

The Beaverhead-Deerlodge Forest should be providing sustainable and predictable levels of production and services. The level of timber offered from the Beaverhead-Deerlodge has steadily declined over the past decades.

From an industry perspective, we see several solutions to the problems we are facing based on the current planning process we have been involved with in the Beaverhead-Deerlodge forest.

No. 1, U.S. Forest Service needs to incorporate industry stakeholders in the planning efforts. Without properly defining or treating stakeholders in their planning process, the Beaverhead-Deerlodge Forest has created a DEIS riddled with shortcomings. The U.S. Forest Service needs to complete economic analysis, and this is the first step in doing so.

No. 2, the U.S. Forest Service should provide scientifically defensible progressive management approaches. There appears to be very little consistency between forests on the use of the latest most defensible science as well as the many tools available to address these issues. For example, we encourage a more aggressive use of stewardship contracting to address multiple resource objectives.

No. 3, avoiding the court systems. Region 1 alone has 360 million feet tied up in litigation, with 80 million feet of this in our immediate working area. There must be a means developed through legislation to limit this, or if nothing else, at least limit the time it takes to resolve these challenges.

No. 4, a creative approach to U.S. Forest Service budgeting needs to be developed. If they are to manage our forests, they must be adequately funded. The draft Beaverhead-Deerlodge forest plan and DEIS fails to publish an allowable saleable quantity, but instead, has produced estimated outputs based on past performance. They have cited predicted future budget constraints as their limitation to timber output. Stewardship contracts and other tools are not even considered by the forest, which would help alleviate budgeting issues.

No. 5, accountability must be addressed. We continue to see some forests doing what they can to accomplish their goals, while others do little or nothing. Reducing the budget for nonperforming forests is not a good solution. It has a definitive negative effect and impact on all of us who use and depend on these forests.

PREPARED STATEMENT

In summary, we are at a moment in history where we have a unique opportunity where timber harvesting can be utilized to help create a diversity and age class structure more representative of historic conditions. These conditions are considered models of ecological sustainability. Such an approach could reverse trends in timber supply and allow Montana mills to survive. Let industry be used to become a greater part of the solution needed to bring our national forests into a better managed condition. I thank you. I conclude my remarks and will be open for questions.

[The statement follows:]

PREPARED STATEMENT OF SHERMAN ANDERSON

Honorable Senator Burns and Members of the Committee: My name is Sherm Anderson. I live in Deer Lodge, MT, located in Powell County. I would like to thank you for taking the time out of your busy schedules to make this long journey to Missoula. On behalf of the employees of Sun Mountain Lumber and their families, I thank you for this opportunity to provide testimony on the state of the national forest planning and the subsequent impact on our mill, community and local economy.

I have worked in the timber industry-all my life. My father was a small sawmill owner and logger. I remember at a very young age working at the family sawmill or in the woods during summers and whenever school was out. About 30 years ago my father moved to Wyoming and I remained in Deer Lodge to start my own business, Sun Mountain Logging. There were numerous mills in operation back then and work was plentiful. We continued to expand the business. I say "we" because I have two sons and a son-in-law working in the business plus two grandsons who work when they are not in school.

Two years ago when Louisiana-Pacific decided to divest themselves of the sawmills they owned, we purchased the sawmill and finger jointing operations in Deer Lodge. At that time I could see the danger of the Deer Lodge plant becoming yet another closed facility as I have seen so many others before. Sun Mountain Lumber, as it is now called, produces 2x4 and 2x6 studs. Our annual production capacity in the saw mill is 125 million board feet (mmbf). Our finger jointing plant, a value-added facility and remanufacturing plant's annual production capacity is another 100 million board feet. This is enough lumber to frame 20,000 average American homes. (National Association of Home Builders 2005) In Montana alone there were 2,047 single and 4,194 single and multiple unit housing starts in 2004. (Economic 2005) Clearly, our business provides not only in-state but serves as an export industry all over the United States, bringing outside money into the state of Montana. Indeed, lumber production is a cornerstone of the Montana economy. Ironically lumber production continues to decrease in our state as more and more production facilities close their doors for lack of timber supply.

The role of our company in the local economy is paramount. As one of the largest employers in the Deer Lodge, Butte and Anaconda area, we provide livable wages including total benefits capable of sustaining families and maintaining healthy life-

styles to our 290 employees. Our annual payrolls inject over twelve million dollars into the local economy directly through our employee wages. Our payroll provides a catalyst to the local economy, having a ripple effect indirectly through local contractors and services, increasing the state and federal tax bases.

As we compete in the international community, we are working on uneven ground. We are subjected to different environmental standards, being required to spend large amount of time and money in the planning processes and dealing with diminishing or erratic timber supplies, conditions which hurt our ability to compete.

As a renewable resource, timber production is truly one of the most environmentally friendly natural resource industries. No other substitute for lumber framing in houses is as environmentally friendly or economically viable. In contrast, the use of metal framing in construction involves the extraction of a non-renewable resource and significant processing before it can become a useable product, resulting in a much higher environmental impact. As forestry professionals, we, as a company and as a viable industry, are committed not only to responsible land stewardship, but also to a renewable and sustainable timber resource. This is a good business for the state of Montana. But as we continue to struggle to survive, we are reaching out longer distances, even into surrounding states to obtain the needed timber supply. Sadly, there are vast amounts of timber on Montana's national forests surrounding us that are dying and/or burning in catastrophic fires, lying unused and going to waste. As an example, here are some statistics from the Beaverhead/Deerlodge National Forest, the forest which is in closest proximity to our facility:

Areas affected by beetle kill only:

2002—73,000 acres

2003—72,000 acres

2004—151,000 acres

In the Butte District, less than 60 miles away from us, 2004 estimated beetle kill was 54,900 acres. In 2005, that amount could easily have doubled. There have been only 1,622 acres of timber sold; of that, 1,574 acres are located in the Butte watershed. That sale was appealed but the Forest Service prevailed. It was then sold but was further appealed to the 9th Circuit Court, resulting in an injunction and halt to the timber harvest. The Butte District has another 530 acres proposed for sale, probably in early 2006. Thus far, only 2,152 acres have been proposed for some form of timber management out of 54,900 acres estimated dead in 2004. This is only 3.9 percent of the estimated dead. If, or more likely, when this watershed burns, the estimated cost to the city of Butte to install an adequate water filtration system would be \$15 to \$20 million (at today's cost).

Further statistics from our company I would like to share with you:

Our percentage of U.S. Forest Service volume, including all forests under contract, in comparison to our total volumes under contract, going back 5 years:

2001—35 percent USFS—65 percent Other

2002—35 percent USFS—65 percent Other

2003—29 percent USFS—71 percent Other

2004—14 percent USFS—86 percent Other

2005—5 percent USFS—95 percent Other

These downward trends tell the story. Our state and private lands cannot continue to support us at these levels. Our survival is dependant on our National Forests.

We recently hired the Ecosystem Research Group to provide comments on our behalf concerning the Beaverhead/Deerlodge Draft Plan and Draft Environmental Impact Statement. Their comments outline a detailed, scientifically defensible approach to increasing timber supply while sustaining sensitive species habitats and managing close to historic landscape dynamics. As business owners and tax payers it is astonishing to us that we have to hire a third party to critique and analyze USFS planning.

The BDNF should be providing sustainable and predictable levels of products and services. The level of timber offered from the Beaverhead/Deerlodge has steadily declined over the past decade. Communities that lack industrial or economic diversity may be negatively affected by the proposed BDNF Plan. The full effects to these communities have not been analyzed or disclosed in the BDNF Draft Forest Plan. As a stakeholder with potentially large economic impacts, we should be treated with a much higher weight than the BDNF has provided in their planning efforts. From our standpoint the BDNF is exhibiting a denial of its potential impacts on local timber dependent communities and is assuming that if they ignore the problem, it will just go away.

RECOMMENDED SOLUTIONS

From an industry perspective we see several solutions to the problems we are facing based on the current planning process we have been involved with on the BDNF.

USFS to Incorporate Industry Stakeholder in Planning Efforts.—Without properly defining or treating stakeholders in their planning process the BDNF has created a DEIS riddled with short-comings. The USFS needs to complete better economic analyses and this is the first step in doing so.

USFS Provide Scientifically Defensible, Progressive Management Approaches.—There appears to be very little consistency between Forests on the use of the latest most defensible science as well as the many tools available to address these issues. For example, we encourage a more aggressive use of Stewardship Contracts to address multiple resource objectives.

Avoiding the Court Systems.—Region 1 alone has 360.49 mmbf tied up in litigation, with 80.6 mmbf of this in our immediate working area. There must be a means developed through legislation to limit this or, if nothing else, at least the time it takes to resolve these challenges.

Creative Approach to USFS Budgeting Needs to be Developed.—If they are to manage our forests, they must be adequately funded. The draft BDNF Forest Plan and DEIS fails to publish an allowable sale quantity (ASQ) but instead has produced estimated outputs based on past performance. They have cited predicted future budget constraints as their main limitation to timber output. Stewardship Contracts and other tools are not even considered by the Forest Service which would help alleviate budgeting issues.

SUMMARY

We are at a moment in history where we have a unique opportunity where timber harvesting can be utilized to help create a diversity in age-class structure more representative of historic conditions. These conditions are considered models of ecological sustainability. Such an approach could reverse trends in timber supply and allow Montana mills to survive. Let Industry be used to become a greater part of the solution needed to bring our National Forests into a better-managed condition.

Senator BURNS. Thank you very much, Sherman. We appreciate that very much.

Now we have John Gatchell, Montana Wilderness Association. John, thanks for coming today, and we know of your conflict, so thank you for coming.

STATEMENT OF JOHN GATCHELL, CONSERVATION DIRECTOR, MONTANA WILDERNESS ASSOCIATION

Mr. GATCHELL. For the record, my name is John Gatchell. I want to thank you, Senator Burns. I'm here to represent the 7,000 members of the Montana Wilderness Association, which was founded 47 years ago by Montana hunters and conservationists to safeguard Montana's vanishing wilderness.

Our members view Montana's wilderness as a public land trust that will always provide great hunting, fishing, camping under the stars and quiet mountain trails. Our western wildlands embody core American values: Freedom, self-reliance, family and tradition. Keeping this heritage intact takes commitment, and wilderness designation for deserving lands is a commitment that we can rely on and pass on to our kids.

We're determined to work with friends and neighbors to achieve this objective, but we're willing to listen and work with others, take risks and help provide leadership to move our State forward. We do need to see that this path has rewards.

Forest planning matters to all of us. The forest plan is a contract between the people who own and those who manage our national forests, and this contract should provide clarity and certainty for all who have a stake in public lands.

In Montana different people seek different commitments in the forest plan contract, whether it's small mills, snowmobilers, hunters, communities or conservationists. But we want tangible commitments. We want to know where we stand today and what will remain tomorrow.

Because the forest plan looks across very large and very diverse mountain landscapes, it really provides a great opportunity to build new partnerships. As you see in our written testimony, we think the Seeley Lake Ranger District provides a model of new approaches to old problems.

Five years ago Seeley Lake faced a crisis. Headlines announced the imminent shutdown of Pyramid Mountain Lumber, that's the largest employer. Recreationists were embroiled in angry conflict. Today we welcome opportunities to work cooperatively with Pyramid. They're widely recognized as a leader in forest stewardship, in stewardship projects, salvage sales and forest plan revision.

The Seeley Lake Ranger District has amended its forest plan successfully to reflect a winter recreation plan that was jointly suggested by the Montana Wilderness Association and the Seeley Lake Snowmobile Club. This plan ensures great snowmobiling, but it also protects wintering wildlife and quiet winter trails within easy reach of Seeley Lake.

Over the past year we've applied these new approaches to forest plan revision in the Seeley Lake Ranger District working out landscape-based solutions working with Pyramid, with snowmobilers, area ranchers and wilderness outfitters.

Last May your staff, Larry Anderson, was present when snowmobilers and conservationists met in Lincoln, Montana, to sign another winter recreation agreement. This agreement also protects popular snowmobiling in the Lincoln area, but at the same time it protects wildlands and winter wildlife habitat along Montana's Rocky Mountain Front.

After 20 years of fighting in every arena, believe me, Senator Burns, there's still plenty we disagree on, but today we're working as partners committed to a single winter landscape plan and that's a change.

Other winter agreements have successfully been reached covering national forest lands in the Big Belt in the Whitefish Range, the Flathead forest, Big Snowies and Little Belt Mountains. When the Big Snowies' agreement was challenged in court last year, the Montana Wilderness Association and the Montana Snowmobile Association intervened, on the same side, and successfully, thus far, to defend this agreement. And this takes commitment, Senator Burns, and the leaders of both organizations have taken significant risks to move our State forward.

We believe there are other parts of the State where the ground is fertile for Montanans to work together. However, mixed or even contrary signals from Agency or political leaders can stymie dialog and push Montanans further apart.

We've got decade's old, deep ruts that keep Montanans severed, and its strong leadership from Agency and elected officials that is essential. This means giving people the right signals and incentives to do the right thing. Talk to your neighbors, work out differences, and you will be rewarded.

Managing off-road vehicles is probably the most contentious issue on our public lands today, especially for summer use. According to the National Association of Counties advances in off-road technology have spread noxious and invasive weeds, increased conflicts between road and recreational users, ranchers, hunters, wildlife and caused environmental damage.

Now, Montanans cherish access to public lands, and we understand that access takes many forms that do not require off-road vehicles. Communities seek access to open space and quiet trails. Ranchers provide access to hunters afoot, not riding ATVs. Hunters enjoy access to State school trust lands but we leave our vehicles behind on the road.

Public access is threatened today, not by setting responsible limits to off-road vehicle traffic and enforced travel plans. It's threatened because Congress is considering legislation that would sell public lands, and that would mean no access. So, Senator, we urge you to protect public access by opposing bills currently being considered that would sell public lands.

Two hundred years ago when President Jefferson acquired 529 million acres of western land, including the area of Montana, critics attacked him for foolishly purchasing an immense wilderness. Today we have over 90,000 miles of roads, but less than 4 percent of Montana is actually protected as wilderness.

Our neighboring western States each thrive with a higher percentage of wilderness. Stunning mountain lands that we have traditionally enjoyed as wilderness, from Lolo Peak to the Rocky Mountain Front, will not remain so for our kids without stronger commitments from our Government.

As our valleys fill with subdivisions and roads and traffic in the years ahead—and they're going to—Montana's wild country is going to be worth its weight in solid gold. Some have made a sport of criticizing the Forest Service for recommending any wilderness in revised plans. We feel this position is irresponsible.

Wilderness is part of the multiple use of public lands, and it belongs in our mountains along with the suitable areas for logging, snowmobiling and other land allocations.

We believe the Federal Government has not done nearly enough to demonstrate commitment or vision for the future of Montana wilderness. Lands with high wilderness values and low conflicts have been overlooked by the Forest Service time and again.

Draft forest plan recommendations, for example, fall significantly short of wilderness that is contained in the Senate-passed bill S. 6096 cosponsored by you and Senator Baucus.

You raised two questions about the Beaverhead-Deerlodge recommended wilderness, and they're good questions and I think they're worth answering. When you look at the Beaverhead-Deerlodge you see a forest that is the largest forest we have, larger than Glacier and Yellowstone Parks combined. It includes 16 mountain ranges, 400 miles of the Continental Divide, something like 33 hunting districts. By the way, a third of the elk taken in this State come out of that country, so it's important to us. But it's the diversity of it that gives us areas that have tremendous wilderness character.

You also raised the question of whether it was too expensive to enjoy without—motorized and ATV or what have you—and I think, Senator, we would welcome that kind of comparison. I know for a fact that my wife and I have taken our kids there since they were babies, camping and hiking and enjoying the Pioneers the Pintlars the Tobacco Roots many of these areas. The most expensive part of our trips is stopping for Chinese dinner, in Butte, on the way home, to tell you the truth. We welcome that kind of comparison. I think it's a question that's worth answering.

PREPARED STATEMENT

Our answer, to summarize, is to continue to work to build diverse support for on-the-ground solutions that include Montana wilderness. We hope that you will provide the kind of leadership that brings Montanans together at the table of trust and understanding and encourages home-grown solutions that can move Montana forward. Thank you, Senator Burns, for the opportunity. [The statement follows:]

PREPARED STATEMENT OF JOHN GATCHELL

Thank you, Senator Burns. I represent the 7,000 members of the Montana Wilderness Association—founded 47 years ago by hunters and conservationists to safeguard Montana's vanishing wilderness.

Our members view Montana wilderness as a public land trust that will always provide great hunting, fishing, camping under the stars, and quiet mountain trails. Our western wild lands embody core American values: freedom, self-reliance, family, tradition.

Keeping this heritage intact takes commitment and wilderness designation for deserving lands is a commitment we can rely on and pass on to our kids.

We're determined to work with friends and neighbors to achieve this objective. We're willing to listen and work with others, take risks, and help provide leadership to move our state forward. We do need to see this path has rewards.

FOREST PLANNING MATTERS TO ALL OF US

The Forest Plan is a contract between the people who own and those who manage our national forests. This contract should provide clarity and certainty for all who have a stake in public lands.

Different people seek different commitments in the Forest Plan contract: Whether its small mills, snowmobilers, hunters, communities or conservationists.

We want tangible commitments. We all want to know where we stand today and what will remain tomorrow.

Because the forest plan looks across vast and diverse mountain landscapes,—it provides a great opportunity to build new partnerships.

BEYOND WARRING PHILOSOPHY: SEELEY LAKE

As you see in our written testimony, the Seeley Lake Ranger District provides a model of taking new approaches to old problems. Five years ago Seeley faced crisis: Headlines announced the imminent shut down of Pyramid Mountain Lumber. Recreationists were embroiled in angry conflict.

Today we welcome opportunities to work cooperatively with Pyramid, in stewardship projects, salvage sales, and forest plan revision. Pyramid is widely recognized as a leader in forest stewardship.

The Seeley lake Ranger District amended the forest plan to reflect a winter recreation plan suggested by the Montana Wilderness Association and Seeley Lake snowmobile club. This plan ensured great snowmobile areas and trails while at the same time protecting wintering wildlife and quiet winter trails within easy reach of Seeley Lake

Over the past year we've applied these new approaches to forest plan revision on the Seeley Lake District, working out landscape-based solutions with Pyramid, snowmobilers, ranchers and wilderness outfitters.

LINCOLN, SNOWIES AND ELSEWHERE

Last May, your staff was present when snowmobilers and conservationists met in Lincoln to sign another winter agreement. This agreement protects popular snowmobile areas and trails near Lincoln yet at the same time wild lands and wildlife along the Rocky Mountain Front.

After 20 years of fighting in every arena, believe me there's still plenty we disagree on, but today we are working as partners committed to a single winter landscape plan.

Other winter agreements have successfully been reached covering national forest lands in the Big Belts, Whitefish Range, Flathead, Big Snowies and Little Belt Mountains.¹

When the Big Snowies agreement was challenged in court last year, MWA and the Montana Snowmobile Association intervened successfully to defend this winter agreement.

This takes committment, Senator Burns, and the leaders of both organizations have taken significant risks to move our state forward.

There are other parts of the state where the ground is fertile for Montanans to work together. However, mixed or even contrary signals from agency or political leaders can stymie dialogue, and push Montanans farther apart.

We've got deep, decades old ruts that keep Montana high-centered. Strong leadership from agency and elected officials is essential to move our state forward. This means giving people the right signals and incentives to do the right thing—talk to your neighbors, work out your differences, and you will be rewarded.

Managing off-road vehicles is probably the most contentious issue on public lands today —especially for summer use. According to the Association of Counties, advances in off-road vehicle technology have “spread noxious and invasive weeds... increased conflicts with other recreational users, ranchers, hunters, wildlife, and . . . caused environmental damage.” (2003–2004 Resolution on Off-Highway Vehicle Management on Public Lands, National Association of Counties)

ACCESS DOES NOT MEAN ATVS

Montanans cherish access to public land and understand that access takes many forms that do not require off-road vehicles: Communities seek access to open space and quiet trails. Ranchers provide access to hunters afoot not riding ATVs. Hunters enjoy access to state trust lands—but we leave our vehicles on the road.

Public access is threatened today—not by setting responsible limits to off-road traffic in forest travel plans. It is threatened because Congress is considering legislation to sell public lands. This means no access.

We urge you Senator to protect public access by opposing bills to sell public lands.

CONCLUSION

Two hundred years ago, when President Jefferson acquired 529 million acres of western lands—including the area of Montana, critics attacked him for foolishly purchasing “an immense wilderness.”²

Today we have over 90,000 miles of road, but less than 4 percent of Montana is actually protected as wilderness. Our neighboring western states each enjoy higher percentages of wilderness. Stunning mountain lands we have traditionally enjoyed as wilderness -from Lolo Peak to the Rocky Mountain Front—will not be there for our kids without stronger commitments from our government.

As our valleys fill with subdivisions, roads and traffic in the years ahead, Montana's wild country will be worth its weight in gold.

Some have made a sport of criticizing the U.S. Forest Service for recommending wilderness in revised plans.³ This position is irresponsible. Wilderness is part of the

¹The agreements settle site-specific disputes over winter recreation on parts of five national forests, including two wilderness study areas, a dozen inventoried roadless areas and several tracts of recommended wilderness. Snowmobilers and conservationists also pledge to assist with education, funding, and monitoring to help ensure success in the field. Both parties believe more landscape agreements are possible.

²“A WILDERNESS SO IMMENSE—The Louisiana Purchase and the Destiny of America.” Jon Kukla, 2003.

³Critics have also argued that the Forest Service is creating “de facto” wilderness, in violation of federal law. While it is true that only Congress can add Wilderness to the National Wilderness Preservation System, the Forest Service is required to evaluate and recommend Wilderness where justified, and may restrict uses as necessary to protect resource values. See for example, 36 CFR 219 (FSM), in pertinent part: “. . . all National Forest System lands possessing wilder-

multiple use of public lands, and belongs in our mountains along with suitable areas for logging, snowmobiling, and other allocations.

We believe the federal government has not done nearly enough to demonstrate commitment or vision for the future of Montana wilderness.

Lands with high wilderness values and low conflicts have been overlooked by the Forest Service time and again:

Draft recommendations in the ongoing forest plans fall short of wilderness contained in the Senate-passed bill co-sponsored by you and Senator Baucus.⁴

Senator Burns, you raised two questions this morning regarding recommended wilderness on the Beaverhead-Deerlodge National Forest. First the areas, which as I noted fall short of wilderness contained in your 1992 Senate bill, S. 1696. More importantly, though, is the diverse character of this vast landscape, the Beaverhead-Deerlodge is larger than Glacier and Yellowstone combined, includes 16 mountain ranges, 400 miles of the Continental Divide and 33 hunting districts which provide—and this is very important to us—one-third of all elk taken in Montana.

Second you questioned whether people could afford to use recommended wilderness without motorized vehicles. This is a comparison we would welcome. My wife and I have often taken our kids into the Pioneers, Tobacco Roots, Pintlars, Thunderbolt Creek (Electric Peak) since they were babies. The most expensive part of our wilderness trips was stopping in Butte on the way home for Chinese dinner.

Our answer is to continue to work to build diverse support for on-the-ground solutions that include Montana Wilderness.

We hope you will provide the kind of leadership that brings Montanans together at the table of trust and understanding, and encourages homegrown solutions that can move Montana forward.

Thank you, Senator Burns, for the opportunity to offer our thoughts today.

COMPARISON HOUSE AND SENATE-PASSED MONTANA WILDERNESS LEGISLATION WITH USFS
PRELIMINARY FOREST PLAN RECOMMENDATIONS

National Forest	88 Passed ¹	92 Senate ²	94 House ³	FS 2005 (dr) ⁴	Rdls ⁵	Forest Total
Beaverhead-Deerlodge NF	335,200	9290,000	358,700	249,000	1,881,000	3,335,000
Flat-Lolo-B'root NF	632,000	564,000	731,000	478,000	1,725,000	5,590,000
Kootenai National Forest	113,600	92,000	166,600	624,000	2,220,000
5 forest subtotals	1,080,600	946,000	1,256,300	727,000	4,230,000	11,145,000

¹S. 2751 Montana Wilderness and Management Act. House-Senate compromise bill enacted in October 1988/left unsigned by President Reagan after Congress adjourned.

²S.1696 Montana National Forest Management Act of 1991-Co-Sponsored by Senators Burns and Baucus. Passed Senate March 26, 1992, Amended by House. Vote Blocked on Compromise Oct 8, 1992.

³H.R. 2473 Sponsored by Congressman Williams. Amended and Passed House of Representatives May, 1994.

⁴Preliminary wilderness recommendations contained in draft or initial draft forest plans.

⁵U.S. Forest Service Inventoried Roadless Areas as shown in draft or preliminary forest plans.

Senator BURNS. Thank you, John.

Now we have Russ Ehnes, National Off-Highway Vehicle Council. Russ, thank you for coming today. We look forward to your testimony.

STATEMENT OF RUSS EHNES, PRESIDENT, MONTANA TRAIL VEHICLE RIDERS ASSOCIATION, REPRESENTING THE NATIONAL OFF-HIGHWAY VEHICLE COUNCIL

Mr. EHNES. Thanks, Mr. Chairman. My name is Russ Ehnes, actually. That's all right, that's a tough one to pronounce. I'm president of the Montana Trail Vehicle Riders. I'm here today to present my testimony. However, I'd like to recognize the Citizens for Balanced Use, Families for Outdoor Recreation, Capital Trail Vehicle

ness characteristics must be considered for recommendation as potential wilderness areas during development or revision of a land management plan. Based on site-specific analysis and public involvement, management direction is developed for inventoried roadless areas during the land management planning process that could include (1) protection of wilderness values . . . (2) total or partial restriction of certain uses . . .”

⁴See chart comparing legislation passed by U.S. Senate and House with USFS recommendations, attached below testimony.

Association and Montana Multiple Use Association have also prepared high quality testimonies in their quest to represent the thousands of citizens across Region 1 who make up their memberships. Their plea is for you to recognize the disparities in Region 1 Forest Service management policies and for you to help bring fair, responsible and balanced management to Region 1. Jointly, our desire is to keep our public lands shared for all the public under the sustained multiple use mandate.

Forest planning is an important topic for thousands of Montana families who enjoy Montana's great outdoors, on trail motorcycles, ATVs, snowmobiles and four-wheel drives. There's a 60-year tradition of off-highway vehicle use in Montana. My kids are fourth generation trail motorcyclists. We have ridden snowmobiles since 1964.

OHV recreation and snowmobiling in our national forests are more than something we do on the weekends. They're the glue that binds our family together, and it is important to our quality of life as any form of recreation is to any other Montanan.

OHV recreation is one of the fastest growing forms of recreation; we've already heard. A recent study by the Forest Service Southern Research Station found that 29 percent of Montanans classify themselves as participants in off-highway vehicle recreation, which does not even include snowmobilers.

We also understand the potential for abuse and impacts that can result from unmanaged recreation of all kinds. When Chief Bosworth was the regional forester in Region 1, he recognized the value and legitimacy of OHV recreation and had the foresight to see that we needed sensible limits on what uses could be allowed with off-highway vehicles in largely unmanaged areas.

He worked with the BLM to develop the three-State OHV EIS. Nearly every OHV and multiple-use organization supports that, including us. We also support the new Forest Service off-highway vehicle rule which will result in designated route systems nationwide.

In addition to being the president of MTVRA, I actually work professionally as the executive director of the National Off-highway Vehicle Conservation Council, a nationwide, nonprofit educational organization dedicated to partnering with the Forest Service and other agencies to find and share proven effective management techniques for off-highway vehicle recreation.

These techniques allow the agencies to provide abundant, high quality OHV recreation opportunities in ways that meet riders' needs and expectations while preserving and protecting our natural resources, and they are the alternative to the ignored or closed management style that had prevailed for too many years.

We've worked with the agencies for over 10 years to promote off-highway vehicle management workshops and have had three of those in Montana over the last 10 years. Many of the district rangers, rec planners and resource specialists in Montana that participate in those workshops learned those techniques and implemented them in many areas.

However, it seems that some forest supervisors have chosen not to implement best management practices for off-highway vehicles and have again chosen to ignore it or close it. Unfortunately, the proposed travel plans that we're seeing are very heavy on the "close it side."

We've seen things like elk security cited as common reasons for closure. Yet herds have continually increased in size, and we haven't seen the peer reviewed science to show justification of how herds could benefit from travel restrictions.

We as Americans expect that freedom means we're allowed the liberty to enjoy public lands responsibly, without restrictions unless there is a valid reason identified that justifies restricted access over other management options.

Instead we're seeing proposals within Region 1 that close 40 to 60 percent of our forests that have been open for off-highway vehicle recreation and snowmobile access. These extensive closures are a fundamental shift away from the freedom we expect in Montana, in the United States, and is not in accord with the intent implicit in the 2001 OV EIS.

I'm disturbed by this new trend of designating large blocks of multiple-use areas off limits to motorized recreation and think it's being driven by a number of factors, the first of which is the age-old battle between the preservationist community and the multiple-use community.

I believe the multiple-use community subscribes to the philosophy of Gifford Pinchot, the person who created the Forest Service. We believe we can use and enjoy our forests wisely, respectfully and responsibly not only for recreation but also for clean water and other resources.

John Muir's philosophy is more of a hands-off philosophy that resulted in the creation of our national wilderness system and we need both, and we recognize that. But because there seems to be a majority opinion that we have already set aside enough as wilderness, we've seen people who promote more wilderness change the nomenclature of the debate.

We're seeing the promotion of large blocks of nonmotorized quiet areas particularly in inventoried roadless areas. With these areas closed to motorized users and all but off limits to resource development, their end game is satisfied. They've achieved "wilderness light" and only have to contend with a few bicycles and chain saws of the rarely deployed trail crew.

We're also seeing new designations like "wildland," which prohibit mechanical and motorized use in areas but are never recommended to Congress as wilderness. This is the very definition of "wilderness light." All of this is achieved without the messy involvement of Congress, the body in which lies the sole Peoples' elected authority to establish wilderness.

Why is our community so upset right now? Just as one example of what's happening all over Montana, I can tell you that since my father began riding trail motorcycles in the 1950s, you can no longer go to Bighorn Lake or Heart Lake, which are now in the Scapegoat Wilderness. The trail he used to ride from Rogers Pass to Stemple Pass is closed for grizzly bear habitat.

Seventy percent of the Highwood Mountains are now closed; 90 percent of the Snowies are off limits. Many trails along the Rocky Mountain Front are closed. Many trails in the Big Belts are off limits, and the Rocky Mountain Front Travel Plan Record of Decision will likely close most of the trails in the Badger-Two Medicine and more trails along the Rocky Mountain Front. Cumulative effects of

past closures are real. The Forest Service seems to have a hard time quantifying this, but all you have to do is look at the maps from the past 50 years.

The result of these closures is that we're being pushed into smaller and smaller areas. In eastern Montana, where I'm from, the Little Belt Mountains are fast becoming the last best place to ride. The Montana Wilderness Association wants the Forest Service to close half of the mountain range along with north end of the Crazyes and the Castles in the Travel Plan.

We are again being asked to give up half of our remaining access and recreational opportunities. When we balk, we are accused of being selfish, unreasonable or unwilling to compromise. Remember that compromise only works when both parties have something to lose. In our case, we have given up half of—given up access to millions of acres of Montana back country closures and wilderness designations.

The nonmotorized trail users, with the exception of mountain bikers, have nearly 100 percent access to every area. When an area is proposed for closure, we're told to leave. When an area is left open, the nonmotorized user is asked only to share, only to tolerate status quo. We believe there comes a time when people need to understand the needs of others and be tolerant. People will have to share some areas. We believe the time has come for that.

Another resource we need to be concerned about is our children's future. It is said that our kids are our best export in Montana. That's a sad statement. My daughter is a student here at the University of Montana. My son is in high school. They would love to stay in the Montana, but they don't know that they can because they can't make much money here.

The reason they want to stay is because they enjoy the time that we spend as a family outdoor trail riding, fishing, hunting. As those sports become more restricted and difficult to do and access to public land becomes more restricted, their desire to make the financial sacrifice it takes to live in Montana evaporates. Our talented youth are losing their incentive to stay in Montana. Our population ages and our standard of living decreases. This is now truly a quality of life issue.

There are also thousands of retired Montanans who have lived and worked their entire lives in Montana so they could enjoy the wonders the State has to offer. For many a trail bike and ATVer a snowmobile or four-by-four is the only way they can reach the back country. Again, access is a quality of life issue for our seniors and our physically challenged.

Senator BURNS. Can you wrap up pretty quick?

PREPARED STATEMENT

Mr. EHNES. You bet. Is there a better way? Yes, activity management and strong partnerships. For example, in the Little Belt Mountains there is a truly world-class loop experience for trail users, motorized and nonmotorized. Groups like the Great Falls Trail Bike Riders, the Back Country Horsemen and the Treasure State ATV Association work hand in hand with the Forest Service to maintain that trail system. They've also acquired about a quarter million dollars in grants for on-the-ground work and education,

and we're willing to do our part as a community. Thank you for your time.

[The statement follows:]

PREPARED STATEMENT OF RUSS EHNES

Thank you for this unique opportunity to testify today. My name is Russ Ehnes and I am the President of Montana Trail Vehicle Riders Association. I am here to present my testimony today however I would like you to recognize that Citizens for Balanced Use, Families For Outdoor Recreation, Capital Trail Vehicle Association, and Montana Multiple Use Association also prepared high quality testimonies in their quest to represent the thousands of citizens across Region 1 that make up their memberships. Their plea is for you to recognize the discrimination and disparities in Region 1 Forest Service Management policies and for you to help by bring responsible, fair, reasonable and balanced management to Region 1. Jointly our only desire is to keep our public lands shared for all the public under the sustained multiple use mandate.

Forest Planning is an important topic for the thousands of Montana families who enjoy Montana's great outdoors on trail motorcycles, ATVs, snowmobiles, and four-wheel drive vehicles. There's a sixty year tradition of OHV use in Montana. My kids are fourth generation trail motorcyclists and we have ridden snowmobiles since 1964. OHV recreation and snowmobiling in the national Forests are more than something we do on the weekends. They're the glue that bind our family together and are as important to our quality of life as any other form of recreation is to any other Montanan. OHV recreation is one of the fastest-growing forms of recreation. A recent study by the Forest Service Southern Research Station found that 29 percent of Montanans classify themselves as "participants" in OHV recreation, which does not even include snowmobilers.

We also understand the potential for abuse and impacts that can result from unmanaged recreation of all kinds. When Chief Bosworth was the Regional Forester in Region 1, he recognized the value and legitimacy of OHV recreation and had the foresight to see that we needed sensible limits on what uses could be allowed with OHVs in largely unmanaged areas. He worked with the BLM to develop the 3-State OHV EIS. Nearly every OHV and multiple-use organization supports the rule. We also support the new Forest Service OHV Rule, which will result in a system of designated routes and areas for OHVs nationwide.

I currently serve as the Executive Director of the National Off-Highway Vehicle Conservation Council, a nationwide non-profit educational organization dedicated partnering with the Forest Service and other agencies to find and share proven effective management techniques for managing OHV recreation.

These management techniques allow the agencies to provide abundant, high-quality OHV recreation opportunities in ways that meets riders' needs and expectations while preserving and protecting our natural resources and are the alternative to the "ignore it or close it" management style that has prevailed for too many years. We've worked with the agencies for over ten years to promote OHV management workshops all across the nation with three workshops held Montana.

Many of the District Rangers, Recreation Planners, and Resource Specialists participated in the Montana workshops and have learned these techniques and implemented them in many areas. However, it seems some Forest Supervisors have chosen not to implement best management practices for OHV management and "ignore it or close it." Unfortunately the Proposed Forest Plans and Travel Plans we're seeing are very heavy on the "close it" side. We've seen elk security cited as a common reason for closures yet the herds have been continually increasing in size and no peer-reviewed science to show justification of how the herds could benefit from travel restrictions.

We as Americans expect that freedom means we are allowed liberty to enjoy public lands responsibly, without restrictions unless there is a valid reason identified that justifies restricted access over other management options. Instead we're seeing proposals in Region 1 that close 40-60 percent of forests that have been open for OHV and snowmobile access. These extensive closures are a fundamental shift away from the freedom we expect in Montana and in the United States and is not in accord with the intent implicit in the 2001 OHV EIS.

I'm disturbed by this new trend of designating "large blocks" of multiple-use areas as off-limits to motorized recreation and I think its being driven by several factors. First is the age-old battle waged between the preservationist community and the multiple-use community. I believe the multiple use community subscribes to the philosophy of Gifford Pinchot, the man who created the Forest Service. We believe we

can both use and enjoy our forests wisely, respectfully, and responsibly not only for recreation but also for clean water and other resources. The John Muir philosophy is a hands-off philosophy that resulted in the creation of the Wilderness system in our nation. We need both; but because there is majority consensus that you have already set aside enough as Wilderness, the people who promote more wilderness are changing the nomenclature of the debate. They are promoting “large blocks” of non-motorized “quiet areas,” particularly in inventoried roadless areas. With these areas closed to motorized users and all but off-limits to resource development, their end game is satisfied. They’ve achieved “Wilderness Light” and only have to contend with a few bicycles and the chain saws of the rarely deployed trail crew. We’re also seeing new designations like “Wildlands” which prohibit mechanical and motorized use in areas but are never recommended to congress as Wilderness. This is the very definition of “Wilderness Light.” All this is being achieved without the messy involvement of Congress, the body in which lies the sole People’s elected authority to establish Wilderness.

The second reason I believe we’re seeing wholesale restrictions proposed is the Forest Service’s belief that it doesn’t have the budget to manage recreation. While I know that the agency is constantly being asked to do more with less, I believe there needs to be a fundamental shift in the way the agency views its primary job. Our Forests no longer provide large quantities of timber and minerals for our society. What they still provide is clean water and high quality recreation. Perhaps the budget priorities should reflect this change. The Chief has identified unmanaged recreation as one of the four threats. If this is one of the top priorities for the Forest Service, how much of its budget is devoted to it? While I have no doubt there is a challenge with budget amounts I also believe there’s a priority problem with how budgets are allocated.

Why are we as a community so upset right now? Just as one example of what’s happening all over Montana, I can tell you that since my father began trail riding in the fifties he can no longer ride to Bighorn Lake or Heart Lake, which are now in the Scapegoat Wilderness. The trail he used to ride from Rogers Pass to Stemple Pass is closed for grizzly bear habitat, 70 percent of the Highwood Mountains are now closed, 90 percent of the Snowy Mountains are off limits, many trails along the Rocky Mountain Front are closed, many trails in the Big Belts are now closed, and the Rocky Mountain Front Travel Plan Record of Decision will likely close most or all of the trails in the Badger—Two Medicine and more trails along the Front. Yes, cumulative effects of past closures are real. The Forest Service seems to have a hard time quantifying this, but all you have to do is look at the maps from the past fifty years.

The result of all these closures is that we’re pushed into smaller and smaller areas. In eastern Montana the Little Belt Mountains are fast becoming the “Last Best Place” to ride. The Montana Wilderness Association wants the Forest Service to close half of that along with the North end of the Crazies and Castles. We are again been asked to give up “half” of our remaining access and recreational opportunities. When we balk, we are accused of being selfish, unreasonable, or unwilling to compromise. Compromise only works when both parties have something to lose. In our case, we have given up access to millions of acres of Montana back-country to closures and Wilderness designations. The non-motorized trail users, with the exception of the mountain bike riders, have access to 100 percent of every area. When an area is proposed for closure, we are told to leave. When an area is left open, the non-motorized user is asked only to share; only to tolerate status quo. We believe there comes a time when people need to understand the needs of others and be tolerant. People will have to share some areas. I believe that time has come.

Another resource we need to concern ourselves with is our children’s future. It’s said that our kids are Montana’s best export. That’s a sad statement. My daughter is a student at U of M and my son is in high school. They would like to stay in Montana, but they know they won’t make much money here. Why do they want to stay? Because they enjoy the time we spend outdoors trail riding, fishing, and hunting. As these sports become more difficult to participate in and access to public lands for recreation becomes more restricted, their desire to make the financial sacrifice it takes to stay here is evaporating. Our talented youth are losing their incentive to stay in Montana, our population ages, our standard of living decreases. This is now truly a quality-of-life issue.

There are also thousands of retired Montanans who have lived and worked their entire lives in Montana so they can enjoy the wonders our state has to offer. For many, a trail bike, ATV, 4×4, or snowmobile is the only way they can reach the back-country. Again, access is a quality-of-life issue for our seniors and physically challenged.

Snowmobiling alone has a positive economic impact of over 40 million dollars in Montana. If the dealers, restaurants, hotels and other businesses in Gateway communities can't make ends meet, it becomes a quality of life issue for them as well.

Is there a better way? Yes, active management and strong partnerships. For Example, the Little Belt mountains offer a truly world-class loop trail experience for thousands of trail users, motorized and non-motorized. Groups like the Great Falls Trail Bike Riders Association, The Treasure State ATV Association, and the CM Russell Back Country Horsemen work side-by-side with the Forest Service to maintain an extensive trail system where encounters with other users are rare because the size of trail system disperses the uses. The GFTBRA has also worked with the Forest Service to secure nearly a quarter million dollars in trail improvement and educational grants.

We as a community are ready and willing to do our part but it will require an agency with a strong determination to make recreation management and access for all Montana's citizens a priority.

Thank you again for this opportunity to express our views.

Senator BURNS. You bet. Thank you. We appreciate your testimony. We've got Mike Hillis now, Ecosystem Research Group, EGR. Mike, thank you for coming today.

STATEMENT OF MIKE HILLIS, SENIOR WILDLIFE BIOLOGIST, ECOSYSTEMS RESEARCH GROUP

Mr. HILLIS. Thank you, Senator. I'm Mike Hillis, senior wildlife biologist with Ecosystems Research Group. Thanks for the opportunity. Ecosystems Research Group has reviewed five forest plans in three western States, two regions in the last 2 years. Our intent had been to apply the best science and economic analyses available with the sociopolitical climate for a given national forest.

I'd like to share some of those findings from those five national forests. Let me start out with a little commonality to all five forests. They're all in the west. They're all droughting, strongly disturbance dependent in terms of being influenced by fire and insects and disease. All five forests are older and denser than they've ever been, historically, because of 80 years of fire suppression, in spite of modest to moderate levels of timber harvest in all five of those forests.

Let me start out by identifying some things that seem to work pretty well in forest planning. If we go back to 1982 as a reference point, that's when early forest plan drafts were first hitting the street. If we look at the science in terms of our understanding of disturbance ecology, light years better than it was 20 years ago.

Our ability to monitor historic conditions as a reference point is wonderful. We finally have a wonderful data base in our assessment, which allows us both to make decisions and to monitor over time.

As Chuck Keegan mentioned we've got demonstrated ability to use a variety of tools including commercial timber harvest, prescribed burning, thinning, and road restoration to restore landscapes. So we have got a lot of things going really well.

If you look at the National Forest Management Act and the National Environmental Policy Act, they provide very specific direction for things like wildlife and monitoring and so forth.

There's obviously some things that don't work very well, as Dale Bosworth mentioned: Contention. It's kind of an ugly time to be a forest planner. A lot of that contention is neither civil nor objective. When you look at NFMA and NEPA those laws are 29 and 36 years old and were written during a period of very different values

of what public lands are. Today they're enormously complex. They're often out of proportion to the risk involved.

Let me put that a different way: It shouldn't cost a quarter million dollars to do an EIS to thin 100 acres of ponderosa pine upwind from a subdivision. Yet that's how we're spending taxpayer dollars before we even try to apply treatments on the ground. So you have to think about there's some aspects of those legislations, those laws, that are broken.

We're in an economy of growing deficits and decreasing chance of dollars getting to the ground to do things. So if you're a planner, you think of the contention, the high legal costs, the declining budgets, damn little incentive to push the envelope in terms of doing what needs to be done on the ground to reduce the fire severity, to reduce insect outbreaks, whatever.

Giving you an example on the Beaverhead-Deerlodge, in 1999 the forest completed a 700,000 acre landscape assessment in the Rock Creek Range, which was wonderful. They involved scientists, academia, managers, other agency personnel, local community people and determined from a science base and an economic base what was needed on that landscape to restore it. That included commercial thinning, some other types of timber harvest, prescribe burning, some road restoration, et cetera.

Well, when they got to the forest plan, they included none of that. Why? Too contentious, money probably wouldn't be there anyway, cost too damn much to do it. So you see things like that and you say something is broken.

Just in general, of those five national forests, we've seen an unwillingness to apply the best science because it's sometimes contentious, and so they bend the science a little bit to try to satisfy everybody; an unwillingness to use timber management as a tool to restore landscapes even when it's cheaper and more effective; an unwillingness to identify what's needed because the funding won't be there. So again, you know, those are kind of common themes we've seen.

In summary, if there's four things that we think under the existing laws and regs and the new rule that Dale is talking about that we need in forest planning is No. 1, we need better direction and accountability from the Forest Service.

When we look at national and regional direction for planning, pretty darn good. But when we start looking at it on the forest, it's all across the board. Somebody mentioned that consistency needs to be a goal, and it's not terribly consistent in terms of how we apply wildlife values by building strategies, how we apply economic models, how we apply various types of direction.

No. 2, where ecologically and economically appropriate we need to use timber management as a tool to restore landscapes in the West. Our forests are disturbance dependent. They're getting older. They're getting denser across the board. We're not going to get there with prescribed burning alone or wildlife value unless we can also use timber management where appropriate.

No. 3, we need to maintain working landscapes. If you think of the Beaverhead-Deerlodge as an example, the wildlife values, the visual values are not just limited to national forest lands. We may think that national forest lands are a key. Those lands are inte-

grated through ranchers, through corporate timber lands, through industry and communities. Unless we look at the impacts on all those lands together, we're not going to maintain a lot of those values.

Last we need to apply the best science, period. It's fine to make trade-offs for socioeconomic values. But science needs to stand alone, and we should not compromise that to avoid contention. We are going to have contention anyway. We need to let the science stand alone.

PREPARED STATEMENT

So again, in summary, having better accountability, placing greater emphasis on using timber management as a tool for restoration, placing greater emphasis on maintaining working landscapes on those large scales and anchoring to the science are those things we feel are needed to improve the planning process. Thank you very much.

[The statement follows:]

PREPARED STATEMENT OF MICHAEL HILLIS

Thank you for the opportunity to provide testimony to the committee. We have organized both written and verbal comments around three basic issues: (1) what is good about forest planning on U.S. Forest Service (USFS) lands, (2) those planning functions that are broken or don't work well, and (3) what kind of solutions we can bring to the table to improve public land planning through the revision process under the new National Forest Management Act (NFMA) planning regulations. By necessity, our comments will be critical to some degree. However, please keep in mind that we are here to be productive and to help develop ways to improve USFS planning functions.

Ecosystem Research Group (ERG) is a Montana-based consulting company providing an array of environmental analyses and services throughout the western United States. Our company is composed of environmental scientists, engineers, hydrologists, foresters, ecologists, fisheries and wildlife biologists, economists, and modeling and Geographic Information System (GIS) specialists. We have worked for several federal, state, and local units of government as well as law firms and industry, concentrating on science-based research and solutions to characterize and resolve environmental issues. As a company, we have worked on five forest plan revisions in three states, including two for which we developed entire forest plan alternatives.

This hearing focuses on forest planning and forest plan revisions. While everyone still is getting up to speed with the new regulations, the 1982 regulations are being phased out. The Beaverhead-Deerlodge National Forest (BDNF) Forest Plan Revision is being conducted under the 1982 planning rules. Most of the examples we discuss will come from the BDNF planning process.

CONDITIONS THAT SHOULD GUIDE FUTURE PLANNING EFFORTS

Since initial forest plans were drafted in the early 1980s, our understanding of forest science has vastly improved. Scientists have made huge gains in understanding how natural disturbances such as wildfire and insects have shaped forests in the West. Also, scientists and managers have an improved understanding of how human actions like fire suppression have changed the structure and resiliency of forests to fires and insects (Hartwell et al., 1999).

On a majority of national forests, fire ecologists have modeled and/or mapped historical disturbances (Losensky, 1995). This has allowed resource managers to identify the Historic Range of Variability (HRV), which provides an important reference point to past conditions. Average conditions of the past aren't necessarily attainable or even desirable given today's social demands. Understanding HRV, however, does provide us with a template for retaining or restoring representative elements of historic forests. This is a key element to ensuring long-term species viability and is comparable to Aldo Leopold's sage advice of 70 years ago: "The key to successful tinerking is to keep all the pieces."

Another factor that has changed since the early 1980s, is that the national forests have developed proven and predictable techniques for reintroducing disturbances to restore historic conditions. For instance, techniques using selective logging followed by prescribed burning to restore old growth ponderosa pine are well-documented in the literature (Hillis et al., 2000). Also, the scale at which forest restoration is performed has completely changed. Vegetative treatments are now designed with consideration of the extent of past wildfires and insect outbreaks, to help form the shape and size of projects. The result is that new projects retain a more natural mix of edge and interior forest, a factor critical to protecting many wildlife species. Such landscape-scale treatments also look more natural, a factor that has substantial social value, and are less expensive to treat, a factor that may allow the treatment of more acres with increasingly limited dollars.

Much of the contention over forest plans and vegetative treatment projects has focused on wildlife impacts: During the early 1980s, analyses on wildlife effects were largely based on individual species. As a result of limited research, such single-species analyses were always insufficient in satisfying species viability concerns. Today, biologists use a coarse filter strategy (Samson et al., 2004) incorporating broad-scale data and an understanding of disturbance ecology and historic conditions to identify habitats that have declined or are at-risk, and focus the assessment on species dependent upon those habitats. This method substantially improves the efficiency of analyses by identifying and focusing on those species that are actually at-risk and by not wasting analysis on species that aren't at-risk.

Lastly, the USFS has electronic analysis tools that were unheard of in the early 1980s. The USFS has the ability to map various forest resources using GIS based on satellite imagery or other forest data. Such maps allow managers and the public to visualize the spatial arrangement of a multitude of forest resources, from goshawk nesting habitat to stands at risk from insect outbreaks. These tools vastly improve the ability of the Forest Service to analyze and disclose effects.

PAST EVENTS AND CURRENT CONDITIONS IMPEDING FUTURE PLANNING EFFORTS

The previous discussion concerning all the excellent tools available to managers suggests that (1) planning at both forest and project levels should be inexpensive, (2) decisions should be defensible against appeals and litigation, and (3) decisions should have wide public support. Obviously, that's not the case. So, what has gone wrong, and what factors impede the agency's ability to do more efficient and defensible planning?

The laws that regulate Forest Service planning are the National Environmental Policy Act of 1969 (NEPA) and the NFMA of 1976. NEPA and NFMA have had some very positive impacts on the planning process, including the following: (1) they brought the public into the decision process, (2) they made the planning process transparent, (3) they made the agency accountable, (4) they established a legitimate role for wildlife and other resources, and (5) they mandated monitoring to ensure that project outcomes matched project expectations.

If there's a shortcoming in NEPA and NFMA, it's that those laws are very, very complex, expensive to administer, and difficult to meet. Because of that complexity, those laws are very easy to challenge. Special interest environmental groups have become extremely proficient in demonstrating that many USFS projects do not comply with the minutia of NEPA or NFMA. Think of it this way—a project that is 99 percent in compliance with NEPA or NFMA will still lose in court, regardless of its merits.

Another shortfall in NEPA or NFMA is that the requirements are often out of proportion to the risk when conducting some simple, routine "no-brainer" projects. For instance, a recent project in Missoula's Wildland Urban Interface involved thinning approximately 260 acres of ponderosa pine. The stand had not burned in 85 years and was within a landscape that historically burned every 15 years. The stand stocking was roughly three times what the stand could support and was at extreme risk to insect outbreaks and/or severe wildfire. Furthermore, it was adjacent to and upwind of a high-density housing area. The science and economic analysis indicated that commercial thinning followed by prescribed burning could restore the stand and protect homes in the area. Unfortunately, NEPA and NFMA requirements mandate a costly analysis and monitoring plan to ensure that such projects can survive court challenges. In this case, the project was litigated and upheld by the courts. Unfortunately, the cost to taxpayers was many times greater than it should have been, based on the project's simplicity. Clearly some aspects of NEPA and NFMA need adjustments to make planning decisions more efficient and less costly to taxpayers.

During our review of the last four Forest Plans in South Dakota, Wyoming, and Montana, ERG staff have identified an unsettling pattern in forest planning. Here's what we've observed: (1) Forest Planning Teams typically evaluate the disturbance ecology and objectively calculate the levels of disturbance needed via logging and/or prescribed burning to sustain healthy forests; (2) then, they compare that level of disturbance either against what budget levels they have received or are likely to receive in the future or against the amount of contention they expect from the environmental community; and (3) they do one of two things—they artificially limit the alternatives to what they expect will be, funded, or they reduce the outputs to a level that they subjectively feel won't warrant a challenge from environmental groups. In two of the four forest plans reviewed by ERG, the Forests then "bent" or deliberately misinterpreted the science to justify why such a reduction in outputs was scientifically justified.

ERG understands the approach taken by planning teams. The teams are aware that, regardless of how much treatment is needed, the money required won't be forthcoming. They are also aware that the NEPA and NFMA litigation costs will likely exceed the expected project benefits, and regardless of what they do, they'll be in a constant battle with the environmental community. Modern forest planning is not an easy task.

SPECIFIC FINDINGS ON THE BEAVERHEAD-DEERLODGE NATIONAL FOREST

ERG's review of the BDNF Draft Environmental Impact Statement (DEIS) and Draft Forest Plan had similar findings to the four other national forests plans we critiqued:

1. The BDNF can be characterized as having outstanding wilderness and roadless areas, blue ribbon trout fishing streams, and some of the best elk hunting in the country. Categorically, the BDNF is not a "big timber forest" like the Idaho Panhandle National Forest.

2. The Forest's ecological analysis showed that the BDNF timber stands have been strongly influenced by wildfires and insect outbreaks. That analysis also concluded that those stands are older and denser than they were historically, and are substantially more at risk of higher-than-normal levels of severe fires and insect outbreaks. These changes are the result of fire suppression. Timber harvest did not occur at a scale great enough to offset the impacts of fire suppression.

3. To put that finding in context, the 1986–1987 Beaverhead and Deerlodge plans allowed for –36 MMBF (million board feet) of timber harvest per year, albeit substantially less harvest than actually was accomplished. Also, under the old Plan, the Forest has carried out some prescribed burning, mostly on non-forested sites. While that seems like a moderate amount of disturbance, the Forest's stands have continued to get older, denser, and are more at risk to higher-than-normal levels of severe fires and insect outbreaks. As a result, we expected that at least one alternative in the DEIS would have been designed to introduce enough logging and prescribed burning to reduce age class and stand densities to historic levels. No such alternative was presented.

4. Instead, the "expected output" (that amount of timber expected to be sold per year) was disclosed by the five alternatives as 9, 9, 0.5, 15.7, and 9 MMBF. That's a 75 percent reduction from the 1986 Plan's timber output, and an inadequate range of alternatives as mandated by NEPA. The current range of alternatives appear to violate NFMA by being in direct conflict with Section 219.12(e), which states in part, "As a *minimum* [emphasis ours], the analysis of the management situation shall include the following: (1) Benchmark analyses to define the range within which alternatives can be constructed. *Budgets shall not be a constraint* [emphasis ours]." More importantly, those anticipated levels of disturbance come nowhere close to what is needed to keep forests from further aging, and succumbing to increasingly severe fires and insect outbreaks. The 9 MMBF figure used in three of the five alternatives was cited as the harvest volume best representing the timber that could be sold, based upon the dollars likely available to do the necessary NEPA analyses, timber sale contracts, and administration. Thus, the 9 MMBF was used as a budget-driven constraint, although it had nothing to do with modeled vegetation management needs.

5. Management ignited fire (prescribed burning) and wildland fire use (wildfires that are allowed to burn when conditions are within a pre-established set of prescriptions) are disclosed in the DEIS as the management actions that will keep forests healthy, improve age class diversity, restore stands of aspen, sustain big game winter ranges, and reduce the severity of wildfires and insect outbreaks. We question the social and economic reality of this approach. Monies for performing prescribed burning planning and ignition have been no more abundant than timber

preparation dollars. To the BDNF's credit, USFS staff has completed much needed prescribed burning on grasslands, in grass/shrublands, and within open, Douglas-fir communities. Most of the BDNF's stands, however, are dense, lodgepole pine. Lodgepole pine forests only burn under fairly volatile conditions. If the BDNF is serious about its intent to utilize prescribed burning to recruit aspen and achieve better age class diversity from within lodgepole pine forests, Forest staff would be igniting lodgepole pine forests on a windy, 80 degree September day. This is not a likely or reasonable scenario. To assume that wildfires could be allowed to burn under "wildland fire use" is equally unlikely. The harsh reality of this strategy is that budgets for prescribed burning project design and ignition have remained flat, just like timber preparation budgets. Additionally, the agency has shown no willingness to allow managers to take substantial risks during burning. In fact, the opposite is true. Recent litigation has reduced the agency's willingness to take risks during prescribed burning. In summary, the DEIS's reliance on burning can best be described as "wishful thinking."

6. Prior to Forest Plan revision, the BDNF conducted landscape-scale analyses for all major watersheds under the agency's direction to conduct "watershed analyses at the landscape scale" (EWAS). Those EWAS analyses not only were based on an excellent understanding of the disturbance ecology, but also recognized the social values specific to each landscape. Amazingly, the DEIS largely ignored those findings. Restoration treatments recommended in Rock Creek were discounted as being "too controversial." Treatments recommended in other landscapes were disregarded as they were above and beyond the anticipated timber preparation budgets.

7. The BDNF has failed to address the local economic effects of substantially reducing the acreage of suitable timber. Also lacking are the economic cost tradeoffs of suppressing increasingly large and intensive wildfires resulting from denser and older forests.

8. Private lands and local communities are increasingly at risk from catastrophic wildfire; this risk stems from a management philosophy that relies dominantly on fire as the principle disturbance tool, up to the Forest boundary, in some cases.

HOW CAN WE IMPROVE FOREST PLANNING?

1. *Anchor to Science*

Sound science will provide a strong and defensible rationale for accounting for the needs of the Forest, its diversity and structure, and the dynamics necessary to keep the forest within its HRV. Once science has characterized the forest, social and economic goals and realities can necessarily influence how the Forest will be managed to achieve ecosystem objectives.

2. *Maintain Working Landscapes*

Always manage the Forest in the context of larger working landscapes. In many cases, the Forest has a narrow range of habitat variability compared to the larger landscape. Holistic decisions regarding the Forest will positively affect the future of adjacent lands that leverage the natural resource values of a larger ecosystem. Conservation biologists are increasingly voicing their concern that conversion of private open lands is especially significant in reducing indigenous biodiversity (Knight, 1999). The USFS forest planning process must give great consideration and evaluation to what positive and negative impacts these plans have on adjacent communities and their human ecosystems. At the 2003 National Society for Range Management meeting, a USFS employee wrote, "The emphasis of local ranches that hold public land grazing permits has changed over time from a locally dependant livestock industry to important sources of open space and habitat to maintain biological diversity in the rapidly developing mountain West" (Bradford, 2003).

Forests that maintain both a flow of economically important goods and opportunities result in vibrant local communities. Stewardship contracting can improve the benefits to local communities while providing a funding mechanism to accomplish projects. A complete economic assessment of tradeoffs in management alternatives, such as funding an active timber management program compared to fighting larger and more intense wildfires, can be the basis of minimizing taxpayer costs. As demand among competing and often diverse interests for scarce forest resources rises, land managers are required to justify how such resources are allocated and to whom costs and benefits will accrue. For example, in the case of roadless area designations vs. timber allocation, the Forest Service is required to decide upon mutually exclusive outcomes. In both cases, social, economic, and ecological ramifications will result in an array of costs and benefits over time. Determining the most optimal solution, based on a well-defined set of objectives, necessitates understanding the rela-

tionship between resources, total costs and benefits, opportunity costs of making such decisions, and a profound understanding of how resources are affected.

Economic analysis provides an objective approach to help land managers make effective decisions about resource allocation, regardless of land management objectives. Such analysis is essential to making decisions and, moreover, justifying those decisions to community groups. Economic analysis can be used to provide the following:

- Systematic and objective analysis of economic effects on industry and communities;

- Market values and revenue potential for forest products and non-timber forest products (NTFPs);

- Supply and demand analysis of markets;

- Opportunity costs used to evaluate tradeoffs among objectives, and, more importantly, the value of USFS planning alternatives;

- Values of non-market goods and services, including wildlife, recreation, old growth forests, and wilderness areas; and

- Long-term assessment of fire management programs, including risk and expected outcomes.

3. Focus on Landscape-Scale Treatments and Forest Restoration

Past vegetation projects have often created fragmentation and excess roads that resulted from small patches connected by permanent roads. Science has documented that disturbance in many of the dominant tree cover types common to Montana occurred in large, infrequent events. Future projects should mimic the scale and intensity of disturbances that the forest has incurred historically. Returning to old treatment areas to restore naturally-sized patches and subsequently reducing unnecessary roads can be economically viable and beneficial to ecosystem restoration goals. Such reentries, driven by vegetative restoration, can fund other needed restoration activity that otherwise would be dependent on appropriated funding. Future projects should be designed to mimic natural patch sizes, minimize new permanent roads and be implemented at the landscape scale.

4. Provide Strong National Planning Leadership

Implementation of Forest Plans has been stifled by legal challenges by a minority. Such challenges are often successful because of inadequate Forest Plan analysis or documentation. Projects designed to implement Forest Plans are impeded by tiering off of inadequate Plans. The National and Regional offices can assist the Forests by providing strong, legally defensible direction regarding NEPA, NFMA, and Threatened and Endangered and Sensitive species that utilizes the expertise and experience of the Office of General Counsel. Emphasis should be on avoiding fatal flaws that provide the basis for successful legal challenges to Forest Plan implementation.

SOME COMMON INFORMATION WE NEED TO CONSIDER:

As a result of nearly a century of fire exclusion, and timber harvests that have not kept up with growth, forests are generally older and denser than they were in the past.

In addition, long-term drought and global warming make inevitable wildfires and insect outbreaks occur at larger-than-normal and of higher-severity-than-normal levels.

Aggressive management to reduce forest stocking can soften but not avoid those events.

The United States suffers from a severe trade imbalance. In the 1970s the United States was a timber exporter. Currently, the United States is a timber importer. Thus, we import timber from countries with poor environmental standards, while watching our own timber die from wildfires or insects, and then we make little effort to salvage the value from those dead trees. The logic escapes us!

Senator BURNS. Thank you. You and I need to have a cup of coffee. You've done some great work down there. As we end up the formal part of the witnesses today, I've got a couple of questions I want to ask. I'll start with you, Mike.

Back in the early 1990s we started to look at the new technologies that were coming down as far as telecommunications were concerned. There was a technology out there called digital, and we were trying to deal with all these new things happening, not only in communications but in information services and this type of

thing, and trying to deal with them with a 1935 law. I think I made a speech where digital is going to take away our ability to delineate or to tell the difference or any characteristics whether it's AM or FM radio, whether it's data voice or video or anything like that, but we will be talking about that band width.

Are we talking about something simpler by your statement today as far as when we look at the National Forest Management Act and NEPA? Are we looking at something that's 25 and 30 years old that maybe should be looked at again because we're trying to deal with today's challenges with a law that's not outlasted its usefulness but has to be changed to deal with the times?

Mr. HILLIS. Let me start by saying that I think there's aspects of NEPA and NFMA that are wonderful: Public involvement, mandated values for scenery and wildlife and things like that. But keep in mind that those laws were written when the goal of timber harvest was to optimize timber yield for communities, period. Okay, that's, 29 and 36 years old.

Today timber harvest is done under three basic principles: It's done to mimic historic disturbances whether that be fire or insects or whatever. It's done to mimic the scale at which those disturbances occur, so that it looks pretty good. It makes more money. It's cheaper, and it's done largely with less reliance on permanent roads. So basically, the whole game plan has changed in terms of how we use science, how we use social values and economic values to adjust all of that.

I'd say don't throw the baby out with the bath water. Keep those aspects that make good sense, but recognize that the game has changed, and there are aspects that make much better sense today. If we can recognize the past and that's part of our history, but also recognize where we need to go using the best science, maybe we can get past some of this angst that we all feel.

Senator BURNS. I agree with you, you don't throw the baby out with the bath water. The other day we threw the baby out and kept the bath water. Congress has a habit of doing some of those kinds of things. We operate in 17 square miles of logic-free environment. We have quite a challenge.

Chief, the reason I brought up the Beaverhead-Deerlodge is because of the drastic changes of the ASQ and the wilderness designation, and down there that you're going through the process now that whenever you have moves like that, that's a huge move.

What's the problem there? Are we using a different kind of method to analyze how we select what should be designated as timber harvest or wilderness or whatever? Or, did we change in the middle of the process to where these numbers would be drastically changed?

Mr. BOSWORTH. I think in some degree we're comparing apples with oranges. The old plan had an allowable sale quantity of approximately 43 million board feet, something like that. Throughout the life that's an upper limit. You get an allowable sale quantity and there's an upper limit for all the forest plans.

The last several years the average timber harvest on the Beaverhead-Deerlodge was in the vicinity of 9, 10, 15 million board feet, somewhere in that vicinity.

Under their proposed plan, they would still be offering approximately that amount, that number would not be an upper limit. That number would take into consideration the needs of the land, the expected budgets, the amount of land where timber harvest would be needed. There wouldn't be anything that would prevent an increase in that amount other than budgets.

So what they're trying to do is they're trying to come out with a forest plan that would explain to people how much timber they would expect over the next several years, taking all these things into account that they would be offering, and that number is in the vicinity of 9 to 10 million board feet again, comparing that with the 43 million would be comparing it with a different number.

Senator BURNS. In other words, are you trying to tell me that even though we're recommending this lower number, that does not create a ceiling on how much timber will be available?

Mr. BOSWORTH. That number is not an allowable sale quantity number. An allowable quantity sale number is the ceiling.

Senator BURNS. It's just like if you designate so many acres, though, that we manage as wilderness, are you saying there could be less or could be more?

Mr. BOSWORTH. I think under the proposed plan there's an increased recommendation for wilderness, approximately—I think the number is about 6.5 percent of the Beaverhead-Deerlodge National Forest right now is in wilderness. Under this proposed plan I believe it would move up to about 13 percent of the total forest in wilderness under that recommendation.

Again, they just went through a process for public comments. They've got a significant number of comments. Now, we're going to evaluate those comments, and we'll be making some adjustments to that proposed forest plan. So that's how we try to work this to make sure we hear what people are saying, come out with something that people can get their teeth into and give us their comments, and we'll make some adjustments.

Senator BURNS. Mr. Anderson, you're a part of a coalition of lumber companies that are concerned about the Beaverhead-Deerlodge forest down there, and I think you went as far as you hired a private consultant to review the Forest Services' work; is that correct?

Mr. ANDERSON. That's correct.

Senator BURNS. Did you get that report? Have you had that report yet?

Mr. ANDERSON. We have received it, yes.

Senator BURNS. Can you give us some kind of an idea of what that report looks like?

Mr. ANDERSON. I covered parts of it in my testimony and, of course, my written testimony covers it in more depth. But some of the facets that have been discussed here already, and that is the ASQ, are not addressed in the proposed plan. So from a timber company standpoint, what do we have to look forward to?

In listening to John, I was kind of throwing some numbers together in my head, because he's saying that they have 4 percent of the national forest. I'm saying that we get 4 percent, so I'm not sure where the other 92 percent is going. I was kind of gratified when Russ said they got 40 percent. All we got to find is another 50 some percent.

But at any rate, back to your question. What we found, of course, were numerous things in the plan that were just riddle full of holes so to speak. We submitted our comments, and we're hoping that they take those into consideration seriously and look at revising their plan to what we feel makes more sense.

Senator BURNS. Mr. Keegan, I have to ask you a question. As a Forest Service, have they put enough sales just to kind of keep up with the mortality that we have in the rate share in Montana?

Mr. KEEGAN. Senator, I don't have the State inventory figures with me today, but certainly—

Senator BURNS. Do you have those figures somewhere?

Mr. KEEGAN. I do have those figures. I can provide them. I can provide them to you for the State of Montana. I guess I will be glad to talk to the Region 1 Forest Service folks and discuss that.

It's clear from the State level inventory that, at least there is an excess of—and the Chief can agree or disagree if he has different information—but it's clear that that's an excess of growth over removals and very high levels of mortality on national forest lands in Montana.

Senator BURNS. Whenever you look—when you're coming over Homestake Pass and you look off to your left, if you're going toward Butte, and you see all of that bug kill out there, I think that's what gets my notice more than anything else. Is there a way we can deal with pine bark beetle, Chief?

Mr. BOSWORTH. There's lots of ways to deal with pine bark beetles. One is to get out ahead of it and make sure that we've got the right stocking so that when bark beetles attack, the trees are more resilient to bark beetles. Remember now that bark beetles are a natural, native insect. It's just that they're reacting in an unnatural condition, which is too many trees. We have a number of acres in the State as well as around the West that are attacked by bark beetle.

There again, we have tools that we can use. The problem isn't the science. The problem is being able to get out and get the job done and withstand all of the appeals and the litigation and finally being able to do that.

Senator BURNS. John, you know, you kind of work on the other side of this thing and you see what's happening out there. How would you deal with this pine bark beetle?

Mr. GATCHELL. Well, the Butte District had a sale that we supported through that very area that you're talking about. It's difficult, so we've been supportive of dealing with that. Part of it, I think, is being able to look across this landscape and start building some new partnerships that allow us to be supportive of projects like that, so that there isn't as much process involved, so that we have some clarity about the fact that some of these lands are going to be managed for timber values and the forests are just going to move in that—

Senator BURNS. But how would you deal with that bug, that's what I'm asking.

Mr. GATCHELL. Tie them up actually and use them in the North Fork for cutthroats; they're pretty good.

Senator BURNS. Specifically, if we get the science out here and the Chief has the tools to deal with pine bark beetles—and I think

we're in a crisis in this forest. You drive up here in northwestern Montana, up in the Yak, and it's terrible. If they've got the tools—and it's my understanding the only way you deal with the pine bark beetle—now granted, we had an increase in pine bark because we had drought. I understand they had sick trees, that's been stretched. The only way we've got to deal with that bug is get those trees out of there. Do you support that?

Mr. GATCHELL. Do I support cutting trees? We have supported numerous projects that involve doing that. I think there's also a climate factor. If you look at the science, you'll see that the warmer winters are really having a big affect, that's one of the reasons you're seeing so much of this.

Senator BURNS. What we've got to do is deal with the affect, and I don't want to deal with the symptom. I want to deal with the bug. To resolve that, what I'm asking these two communities together is to come together in some way. He has the tools and recommendations and of a way to deal with it, then I think that's where we really need you to intervene with the Forest Service to make sure it gets done.

Mr. GATCHELL. May I speak to that, Senator? An example was a project actually in Rock Creek, there was some discussion with Rock Creek. I understand from the district ranger she's offering a contract now on a sale that involves thinning without building roads and included four inventoried roadless areas. We're hoping to help showcase that as a model of what could be done to deal with situations where you've got crowded trees from fire suppression, and we did intervene with the Forest Service.

Senator BURNS. I'm a great believer, you know, God does a pretty good job, as a rule, of running and taking care of his acres out there, but every now and again he needs a little help. We have this lawsuit over categorical exclusions that shutdown a lot of things going on. Can you give us an idea, Chief, on the use of categorical exclusions by the Forest Service and how that's impacted you on forest stewardship and what you want to do as far as forest health is concerned.

Mr. BOSWORTH. It's a significant impact. We use categorical exclusions in places where we've gone out and developed a rule and projects we believe will have a minimum amount of affect on the environment. The purpose is to be able to make quick decisions and get out and move with those.

Under that decision, under that court decision, we have to go back out with those comments and appeal for those very small projects, that adds probably 130 to 135 days to the process, something like that. Ninety projects in Montana would be affected by that.

That means in some cases that the project will never happen, because it just takes longer, and it also takes more documentation, a bigger file, that takes peoples' time to get all that documentation in place to deal with the appeals. So you end up with a number of projects that either don't get done, or by the time they do get done, the insects have moved much further.

In some cases the delay of 130 days may be more like a 6-month delay because you go through the winter and you can't get back out

there until the springtime. So there's a variety of effects that are caused.

I'd like to add just one thing that Mike Hillis was talking about a little bit, and it has to do with the overall NEPA and NFMA, as he was saying, that these were developed in a different time. They were developed during a period when we in the Forest Service were focusing on extraction of natural resources, and those laws were established to either mitigate for those effects or to slow down the extraction process.

Today we're in an era of restoration, trying to restore these ecosystems. The very same laws that slowed down the extraction slow down the restoration process. In many cases, we don't get the restoration work done that we need to have out on the land.

Even though we work in a collaborative approach today, organizations like Montana Wilderness Association will work with us as well as the timber industry and in many cases come up with a proposal, but we still get litigated by other organizations. So even though many of us can work together, we still go through litigation and don't get these things done.

Senator BURNS. Well, I'm glad we have both of you on the advisory committee when we start revising and reforming these two acts. But I agree with you. I agree with you. I don't know exactly how we should approach that, but you know, it's a funny thing about law, and it's a funny thing about policy, it's a double bladed axe. It cuts both ways. Some way or other we've got to get by that it just seems like to me and to work hard on that.

Mr. Keegan, I had another question for you, and I lost it. Did you want to make a comment on those laws? That would be kind of interesting.

Mr. KEEGAN. What I will comment on is a concern that Dr. Carl Fiedler from the College of Forestry and Conservation and I have had in our work. Most of the work that we've done on restoration, that I have done on the financial end of it—the economic end, has come from Dr. Carl Fiedler, and it echoes a lot of what we have seen and heard here today. And that is, there is a great opportunity out there both with forest conditions to generate dollars to pay for the improvement of those forest conditions and generate employment, but that's not being taken advantage of because there are certain individuals, and limited number of individuals and groups that will oppose any project that produces a commercial product.

Many of the prescriptions to deal with these forest conditions by necessity require removing material that has commercial value, 8 to 20 inch diameter douglas fir trees, for example, that pay for the prescription.

So that offers a great opportunity not only to do more treatments and generate revenue but generate employment. But there are groups that are litigating virtually every project that has a commercial output and either stopping the project or causing some of the modifications in projects to eliminate projects and make them actually less effective because they are not doing a full comprehensive prescription.

Senator BURNS. Russ, it just seems like to me when we looked at all the forests in restricting motorized travel in some areas that

some of your roads were shut down. They're trying to compact or concentrate motorized travel in some areas where I think it would probably have more damage and ecological damage to the land than if it's spread over a large area. Is that a wrong assumption?

Mr. EHRES. No, actually that's exactly true. Dispersing recreation is definitely the key to sustaining, along with active management. But just concentrating those uses into smaller and smaller areas certainly concentrates those impacts as well.

Erosion or damage to trails is like pollution in that the solution to pollution is dilution. That is also true with use, spread the impacts over a wider area.

Senator BURNS. How do you make those decisions, Chief, on these motorized things?

Mr. BOSWORTH. Well, the—

Senator BURNS. I tell you what. The reason I ask you that, as you move from forest to forest and even ranger station to ranger station, different methodologies are used to make a decision. How do we standardize that to get some consistency when we start the debate on motorized versus no motorized?

Mr. BOSWORTH. Well, for one thing we just recently came up with the final rule for travel management. That's part of the purpose of that rule, was to have more consistency around the whole country in terms of the way we approach travel planning and off-road vehicle use.

This rule will be in effect in December, here in a couple of weeks. I can't remember the exact date. The expectation is that the forests now will be working with the community of interest to designate which roads and trails are appropriate for motorized vehicle use. Of course, that would be within the context of forest plans. It's a great collaborative approach.

What we really want to have is a series—system of roads and trails where people with motorized vehicle recreation desires can go out and have a good experience. We also want to have it so that the land is in good condition, so that the next generation of people can also go out and have similar kinds of experiences.

So now it's a hard job for the forest at the local level working with the motorized user community as well as the environmental community or the folks that prefer to backpack and work together and figure out which trails and which roads—or which new ones we should be putting in.

We don't have a lot of dollars for adding new trails, but we have a lot of partnerships. The motorized vehicle community is very willing to try to help us even constructing and maintaining roads and trails for motorized use.

I think once we get it figured out, trying to find that balance of where we can have those motorized roads and trails, I think that we'll be able to sustain that, and we can provide the kind of experience that people would like to have.

Senator BURNS. I'm just afraid if you concentrate, you keep closing up and you keep concentrating, your impact on that land will be much greater than if we were more dispersed.

Mr. BOSWORTH. There's no question that if you limit, significantly limit, the number of places where people can go—if you had

one trail for all the users, then we've got one trail that would just get beat to heck.

If you have 10 trails then they're probably going to have only 10 percent of the use on each individual trail. So we do need to have an adequate system of trails for people to go. We also need to have an adequate system of trails for people who don't use motorized vehicles, that like too backpack, for them to go. It's making sure we have the right balance out there for people to have that opportunity.

Senator BURNS. Concentrating that you have to start putting up traffic lights. Do you need some more money? Are you requesting more money to manage your recreation resources in the national forests? Have we had a switch in the request of funds as you go through this process of forest products, recreation?

Mr. BOSWORTH. We're—with the——

Senator BURNS. Let's find out what to look for here in this next request.

Mr. BOSWORTH. I'll take a hard look at it, because under this budget climate the conditions, as you well know, dollars are difficult right now. We are trying to find more creative ways of being able to get the dollars to do the job.

When I say creative ways, we would use other kinds of dollars appropriated, like some wildlife habitat dollars, watershed improvement dollars to help us figure out which road and trails in that system, because it doesn't all come from recreation dollars, that's what I'm saying.

By doing a good job of management you improve the water quality, improve the habitat for wildlife by controlling and managing and having a good adequate system. So the answer to that is we're trying to find other ways to be able to—as well as working in partnership—to be able to do the job that needs to be done for travel management.

Senator BURNS. Do you want to respond to that, John? You look like you've picked up a little interest here.

Mr. GATCHELL. Thank you, Senator. Two things: One is that when it comes to weeds and user impact, user conflicts, conflicts with traditional uses not only backpackers, hikers but people on horse back—and I will give you the science on this, of Montana trail users spreading impacts over a larger area is not a good solution. I do agree with Russ that we need sensible limits. We need responsible limits and good management.

But spreading those into larger areas that have traditionally not been motorized use areas, where we have foot and horse trails, would be very destructive for other uses and other issues.

Second, I think that as we look at budgets, it just kind of hits you over the head that the Forest Service is not budgeted to maintain a fraction of the road system that's been built, that we have new technologies today.

One of the answers here is to start thinking—and we supported a bill several years ago—believe it or not, we supported a bill by the Trail Vehicle Riders that gave the forest supervisor authority to allow vehicles on Forest Service roads.

All-terrain vehicles never belonged on our pack and saddle trails. They don't fit on them. They're not a traditional or historic use. We

supported that bill because we do agree that they should have somewhere to go.

I think that you might think about funding a program that may be a pilot of converting roads to trails, not only for that use but also bicycles, because there's a tremendous demand for trails in this State, and they're cheaper to maintain.

That doesn't necessarily mean that we're turning those lands, taking them out of the timber base, because we have different means of doing that. So I think that's one way to expand the pie so we all don't end up fighting over the same ground.

Senator BURNS. You say road to trails, I've got to tell you—remember when we did Roads to Trails? You know, everybody said we're so bad. It's unbelievable. Do you know who did that? It was done in the highway conference, Transportation conference bill, it was Steve Symms and I that got that pushed through Congress.

I think it's been a pretty successful program. I support some of those programs. I want to maintain the infrastructure of a road system in the forest that allows us to do other things other than just timber harvest.

I happen to look at the forest as a renewable resource. I don't think it's any different than a corn field in Iowa or grass in eastern Montana. It's renewable. They grow, and they produce and they die. We harvest and we take care of the soil, and we go for another crop. That's one of the great things about this State is the ability for renewables, and economically it makes no sense to lose more trees every year, more than we're actually harvesting in all of our forests. That would basically do two things: It would make the forest more healthy and more productive and more recreation to enjoy. When you think about that, that's kind of a win/win for everybody. We get down to that.

I've about run out of questions. I'm going to follow up and have a cup of coffee with Mike Hillis. I want to help him rewrite these laws. I think we have multiple users here today that listen to you. From this we can get some collaborative thoughts.

But I think the Forest Service—and as good as the Chief is, the problem I see in the Forest Service you've got people within the service that have different agendas where basically they should all be going in the same direction, and that's our biggest problem, I think, whenever we start putting the policy on the ground.

I realize it's hard to control staff. I know I have a hard time at it. But I'm telling you, there should be one philosophy and everybody should be working toward that philosophy. I really believe that today.

ADDITIONAL STATEMENTS AND LETTERS

Am I forgetting anything? We appreciate—and anybody else that wants to make a comment and make it part of the record, we'll sure do that. Then you may have some questions from the rest of the members of the committee.

Those of you who are here today, if you could respond to those questions to the individual Senators and to the committee, I would be most appreciative. This record will be kept open until December 16.

Where you signed in the address is where you send your comments and so that we can take a look at them.
[The information follows:]

PREPARED STATEMENT OF GREG WEHR, DEERLODGE, MT

Senator Conrad Burns: I attended the field hearing in Missoula MT, on Dec. 2, 2005.

I started a round woods products business 21 years ago. Wehr's Post and Pole and Whispering Pines Pole Co. LLC.

I am writing you concerning the round wood industry in region 1. We who work in the round wood industry are the people who produce the fence rails and posts for most of the western United States. In the Philipsburg Ranger District we have seen a decline from a yearly average of 20 to 30 round wood thinning timber sale contracts, to just 4 sales in the last 3 years.

In the last 4 years in Granite Co. we have lost 2 pole yards. With a loss of jobs and revenue in our local economy.

Post and pole sales have never been contested by the environmental community. The Forest Service cites budget constraints as the reason. But yet the sale of post and pole sales generates revenue for the Forest Service District.

The Forest Service use to pay people to thin the type of timber that we now pay them to thin.

The work that we in the round wood industry do is exactly what the Forest Service says needs to be done we reduce the fuel load and create a more vigorous and healthy forest. Its a win win for our forests and our communities.

I would like to see mandates given to the Forest Service as to quantity of saw timber as well as round wood timber that must be put up for sale in a given district every year. With this would have to accompany a revision of the appeals process.

PREPARED STATEMENT OF DAVID CRONENWETT, DILLON, MT

Senator Burns: I am writing to encourage the conservation of Montana's roadless lands as Recommended Wilderness through the Forest Planning effort, that is taking place on several National Forests around the state.

I would like to know what specifically is driving your thrust to undo wilderness protections for Montana's de facto wildlands. Clearly our high quality of life, hunting-fishing-outdoor heritage and overall economy are sustained by these mostly intact ecosystems.

It is no secret that the motorized recreation industry is pushing to disallow any and all restrictions to manage ATV, snowmachine and other such recreation on public lands. They don't suggest how the American people will pay for noxious weed control, wildlife harassment, ruined hunting and camping trips and safety issues that are directly tied to the use of these machines in the backcountry.

Timber can be sustainably managed on already roaded landscapes throughout Montana. While there is a place for motorized recreation on public lands, it is inconceivable for many of us as to why you would help undo wilderness protections which would essentially allow and encourage motorized use in the backcountry.

The Beaverhead-Deerlodge forest is a magnet for ATVs and other such recreation. The Preferred Alternative of the forest plan strives to bring some balance to the area by recommending and enforcing wilderness management in several landscapes. While this is a great start for quiet recreation, water quality, and native flora and fauna, it doesn't go far enough by a long shot. Alternative 5 only recommends 250,000 acres out of a possible 1.9 million on the B Bar D.

There are plenty of places one can drive to in the United States, not many where you can hunt elk on a two week pack trip. I therefore request that you support such Wilderness Recommendations being proposed in forest planning around the state, **BUT ESPECIALLY ON THE BEAVERHEAD-DEERLODGE**. Such designation has a long and revered history in our nation; it did not simply pop out of nowhere to ruin rural economies. All of the data points out that protected lands do just the opposite: they sustain water quality, biodiversity and a high quality of life for the human community. Wilderness is, in fact and in law, **A PART OF THE SPECTRUM OF MULTIPLE USE**.

PREPARED STATEMENT OF ROGER SHERMAN, WHITEFISH, MT

Senator Burns: Today Montana has over 90,000 miles of roads and only 3.7 percent of our beautiful state is actually protected as wilderness. Our neighboring states enjoy larger percentages of protected wilderness and many have recently passed wilderness bills in a non-partisan cooperation. If we don't protect some our quiet, beautiful places now our children will lose it forever and I want my grandchildren to have quiet wilderness experiences in my special places of the Whitefish range and Cabinet Mountains.

Our valleys are filling with development as Montana grows. We here in the Flathead are experiencing tremendous growth.

ATVs and other motorized vehicles belong on roads not horse and hiking trails. Please support the National Assoc. of Counties and call for the Forest Service to "expedite" plans to set responsible limits on ORV traffic, to prevent the spread of noxious weeds, user conflicts and resource damage.

Please forgo polarizing politics and provide a new strong leadership by bringing people together with creative solutions. The original concept of Multiple Use included a good percentage of wilderness. Wilderness is not a BAD word, the bible uses it.

Thank you.

PREPARED STATEMENT OF KLAUS H. GUMP, BIG SKY, MT

Senator Burns: We are very blessed to live in this wonderful State Montana. But we need to keep it in the way we all appreciate it and love it so dearly.

One of our greatest treasures is the wilderness in our State. When it is destroyed it cannot be rebuild. I urge you to do your utmost to preserve the wilderness in our State.

—Less than 4 percent of Montana is protected wilderness—our neighboring stated enjoy higher percentages of wilderness.

—We have sufficient roads in our national forests. Let's leave the forests wild and as habitat for wildlife, like bears, elks, etc. They were there first—and they need their habitat.

—Please do your utmost to protect the wilderness and the National Forests in our State. Let's pass it on to our and your children as a protected area. Preservation of wilderness is a commitment for the future. You need to protect this commitment!

—ATV and other motorized vehicles belong on roads not on quiet mountain trails. ATVs ruin nature for ever. No vegetations will ever grow back in the areas destroyed by ATVs.

I hope this letter answers your questions and you will be a champion and leader in the protection of our great State of Montana.

PREPARED STATEMENT OF LINDA SENTZ, CHOTEAU, MT

Senator Burns: It's my understanding that you want to hear from Montanans about wilderness and wild places. Please consider my sentiments below.

—People go to the mountains to find peace and quiet and open spaces free from the noise of "civilization." This is a legacy that most Americans want to pass on to our kids and grandkids.

—Montana already has 30,000 miles of roads on national forest lands. Less than 4 percent of Montana is actually designated as wilderness. Montanans and Americans want our heritage of open spaces to be protected for future generations.

—Wilderness and non-motorized wild country IS multiple use.

—Four-wheelers and dirtbikes belong on roads, not on traditional horse and hiker trails in the mountains. You should support the National Association of Counties' request that the Forest Service expedite travel plans that require responsible limits on off-road vehicles, to prevent landscape damage and the spread of noxious weeds.

—Americans want their political leaders to provide strong leadership to protect our public lands, and not play politics that polarize. We need to come together to solve these problems, and we can do it.

—Let's keep our treasured public lands public. And let's protect Montana's finest wild country and quiet mountain trails on national forests for traditional recreation.

Thank you.

PREPARED STATEMENT OF CLAIRE BAIZ, TOM BAIZ, SAMANTHA BAIZ, AND ASA BAIZ,
GREAT FALLS, MT

Senator Burns: As a native and lifelong Montanan, I am concerned about your questions regarding Montana's wilderness.

Our wilderness legacy is a priceless heritage for our children. It's also a big reason people move to Montana: the open spaces are a deep attraction, even for those who never "use" them. Without our wilderness, we'd just be another parking lot waiting for development.

Your Senate bill (S. 1696) was passed despite federal plans to recommend LESS wilderness. I applaud your co-sponsorship of S. 1696. With less than 4 percent of Montana designated as wilderness, now is the time to draw the line, for our children, for our recreation, and even for our economy! Wilderness IS multiple use.

Please provide the leadership we need to preserve what's left of our Montana wilderness.

Thank you for your time.

PREPARED STATEMENT OF DR. VICKI WATSON, MISSOULA, MT

Senator Conrad Burns: I understand that you recently asked that your constituents let you know what we think about keeping roadless areas roadless vs building more roads into these areas. I feel that only 4 percent of Montana is actually designated wilderness and that we already have 30,000 miles on roads on our national forests. Hence we need to protect the small amount of roadless area that remains. This roadless land is serving many multiple uses. It supports hunting, fishing, hiking, wildlife viewing and tourism. It provides key ecosystem services like air and water purification, moderation of flows, wildlife habitat, soil building and more.

These lands support the high quality of life here in Montana, supporting our property values and giving our kids wholesome recreation. These lands will not be improved by roads which spread weeds, increase landslides and increase the incidence of human caused fires. Let's fix the roads we have and not build more. Thank you for listening.

PREPARED STATEMENT OF GREGG WHEELER, HELENA, MT

Senator Burns: I am writing to encourage you to use your leadership to protect Montana's wilderness areas. Being able to use our state's wilderness areas for non-motorized recreation—hiking, backpacking and cross-country skiing—is an important reason why I and my family live in Montana. Preserving this natural heritage is vital to maintaining the water and wildlife resources we use throughout the state.

I urge you to seek and support legislation that will increase Montana's wilderness areas and limit off-road vehicle use on mountain trails.

PREPARED STATEMENT OF CHRISTIAN FRAZZA, HELENA, MT

There is so little "wilderness" left compared to all the lands being developed, with motorized access, or commercially exploited. We need more, not less. ORVs and snowmobiles regularly go where they are prohibited. For example, skiing at Stemple Pass, in one of the few areas where motorized access is prohibited, I regularly meet them or must ski trails torn up by them. As Helena grows it is ever harder to find peace and quiet. Wilderness designation, far from "limiting" people's enjoyment of public lands, allows it and ensures that there is somewhere left to enjoy away from roads and machinery.

PREPARED STATEMENT OF JAN TUSICK, POLSON, MT

Senator Burns: I urge you to not to increase roads into our roadless lands. We go to the mountains to find peace and quiet and open spaces free from the noise of "civilization." This is a legacy I want my grandchildren to enjoy, not the legacy of torn up trails and noise from ATV vehicles.

Montana already has 30,000 miles of roads on national forest lands. Less than 4 percent of Montana is actually designated as wilderness. Montanans and Americans want our heritage of open spaces to be protected for future generations.

Wilderness and non-motorized wild country IS multiple use.

Four-wheelers and dirtbikes belong on roads, not on traditional horse and hiker trails in the mountains. Sen. Burns should support the National Association of

Counties' request that the Forest Service expedite travel plans that require responsible limits on off-road vehicles, to prevent landscape damage and the spread of noxious weeds.

As an avid hunter I have experienced the damage off road vehicles can do to trails. I also have experienced the intrusion of those vehicles as I quietly walked through the woods to find my deer. Enough is Enough—we need to protect what remaining lands we have. I urge you to provide strong leadership to protect our public lands, and not give in to the pressure from a loud minority. Look at Yellowstone and the damage that has incurred from off road vehicles, what have we learned from that overuse of a irreplaceable, valuable public land?

Let's keep our treasured public lands public. And let's protect Montana's finest wild country and quiet mountain trails on national forests for traditional recreation.

PREPARED STATEMENT OF CRAIG PABLO, PABLO, MT

Dear Mr. Burns: In regards to your questions at the Senate Oversight Hearing in Missoula on Dec. 2, I offer the following comments:

1. The USFS recommends areas of Montana as wilderness to allow the public to enjoy our state's natural beauty in a peaceful environment.

2. With over 30,000 miles of road already on our state's national forests, wilderness and roadless areas are a small part of the multiple use of our forests. MULTIPLE use includes people enjoying the forests on foot or horseback not just passenger vehicles, ORVs etc.

3. Less than 4 percent of Montana is currently designated wilderness, as a hunter, fisherman and outdoor recreationist I value these wilderness areas to pursue my outdoor passions; hunting elk and deer, flyfishing for trout and hiking.

4. I truly support multiple use of our national forests. I also enjoy snowboarding on ski areas within our national forests and snowmobiling/snowboarding the backcountry in these same forests. So Mr. Burns I truly utilize these forests with multiple uses.

5. Lastly I would hope a man in your position would first realize multiple use really means, the ability to enjoy our national forests on foot free from vehicle noise and traffic, on a snowboard in a designated ski area, on a snowmobile and snowboard in undesignated ski areas and on a horse pursuing elk and deer.

6. I strongly urge you to take a stand using your position to bring people together to protect our national forests rather than using politics to polarize Montanans against each other. It's time for Montanans and our politicians to join forces for a well thought out solution that's agreeable to everyone and I hope the voters will voice that strongly during the next election.

PREPARED STATEMENT OF JIM AND MARY LOU SOLDANO, GREAT FALLS, MT

Senator Burns: In answer to your questions about non-motorized areas of the forest and wilderness lands in Montana, I would like to say that most people who use the forest do so to escape the hectic and busy life that they lead in their daily life. If they wanted to hear the exciting sounds of motor vehicles all that is necessary is to go out and sit on their deck or front porch of their own residence anywhere in the state. Camping in a campground along any highway in Montana includes plenty of noise pollution. There are thousands of miles of roads in the forest service lands where motor vehicles can legally be used. There is no reason to ride them in off road areas. Wilderness uses are part of multiple use! The recreation industries generate many dollars and this revenue is renewable and sustainable from year to year. The demand for wilderness experiences is growing world wide and much of that demand ends up in Montana. The reason is that Montana is the last place in the lower 48 that can provide this experience. As one of our elected leaders you should provide leadership in the efforts to protect the wilderness and the roadless lands that we have left in this great state. Help safeguard our public land in Montana. Thank you for your opposition to the Pembo rider to the budget bill. Please help to eliminate it since it is very detrimental to our state.

PREPARED STATEMENT OF FRED J. SCHWANEMANN, MISSOULA, MT

Senator Burns: I found the hearing on 12/2/05 in Missoula educational and informative.

Thinking of trees as a renewable resource is good as long a Tremendous Amount of Time until the next tree harvest is kept in mind.

Thinning can be a good academic way to increase forest tree production. However, I believe cutting strips of trees through the forest may be less expensive. The strip cutting does not look that well, but might serve as a fire break.

If extraction and restoration are done commercially a tough regulatory board will be needed to check it.

PREPARED STATEMENT OF ADAM SWITALSKI, MISSOULA, MT

I am writing to comment on the Senate Oversight Hearing in Missoula on December 2nd. Senator Burns asked why the Forest Service recommends areas of Montana wilderness when, in his words, "wilderness limits the ability of folks to enjoy" public lands by keeping mountain areas free of off-road vehicle traffic.

I am a Montana resident who enjoys the many benefits of Wilderness. I visit Montana's wilderness areas approximately 25 times a year to hike, camp, and ski. Less than 4 percent of Montana is designated Wilderness and this is not enough for western Montana's booming population. I go to wilderness to gain peace and quiet that is not available in roaded motorized areas. Wilderness is the only place where I can escape the noise and pollution of off-road vehicles. Besides finding solitude, wilderness is a place where fish and wildlife can find refuge and provide a source for all of Montana's great fishing hunting. Hunting and fishing is simply not as good in the roaded and degraded public lands. Thank you for protecting our last unspoiled lands in the "last great place."

PREPARED STATEMENT OF JOHN SCHIEFFELBEIN, FAIRFIELD, MT

While the number of State and Federal Forests and Parks have not grown in any substantial way for many decades, the human population has. The country sides of just a few short years ago, are now shopping malls and new homes. The native animals and flora are displaced or destroyed.

When I was a child my family were one of the first families to be able to travel around Lake Superior. It was called the "Circle Route Drive". It marked the first time in history that there was a road that linked the north shore area of Lake Superior to Minnesota and Michigan and Wisconsin. The whole area was still very pristine and beautiful with very few people. Yes, we (my family) were a part of the impending onslaught of vacationers and tourists to visit the area.

We were the start of the destruction of what had been pristine. Even with the best of intentions and the hope for greater commerce the area was changed for ever. Native American stone wall painting were stolen and ruined. A special ceremonial spruce tree that had grown on a rock out cropping for centuries was destroyed by people that gave the site little if any respect. Native peoples who had buried their loved ones above ground for centuries found the gravesites damaged and in some cases looted and insulted.

Relationships between species in the area that had been in balance for more life times than one can imagine were irrevocably changed.

We have lived here a short 9-10 years. That means that we have added to the stress the forests and natural resources as well. We try reverently to leave the areas where we travel the same as they were before we were there. However, almost every time we travel into the mountains we find someone hunting out of season, driving their choice of vehicle (cars, 4x4s, trucks, SUVs, and snowmobiles where it is "not allowed". It is not the fault of the good law enforcement officials or the parks and forests staff members. It is just the simple fact that Montana is extremely large and has a very inadequate number of officials and law enforcement personnel to ensure that the current laws are followed.

So to add more opportunities for more abuse by those who know they won't get caught just doesn't make sense! Even when caught these people often just get warnings as the enforcement staff are fearful of more direct confrontations and having no backup close.

Montana has thousands and thousands of roads already we do not need more. ATVS and all other motorized vehicle belong on roads not forests.

We were out last weekend getting our Xmas Tree (with permit) and found people taking trees from areas they were not to be taken and saw where others had been 4 wheeling in areas not allowed for 4 wheeling or driving.

My family really likes to go camping (with tents) in the back country and not have to hear sounds of motors of any kind.

If you care about long term protection of the wilderness for you and your childrens and my children you will help keep the wilderness a wilderness as it has been for

thousands and thousands of years. We have all got to start to think differently in order for our children to survive.

Thanks for you time.

PREPARED STATEMENT OF M.C. VON DER PAHLEN, RONAN, MT

Senator Burns: I appreciate your request to hear from the public regarding the U.S. Forest Service's recommendation on further wilderness in Montana and the current policy that restricts motorized vehicles in wilderness areas. I urge you to support this management policy, which maintains and upholds the "multiple use mandate" of the U.S. Forest Service.

There are numerous roads in U.S. Forest Service that are accessible to motorized vehicles already. There should also be public areas that provide the non-motorized backcountry experience that is so unique to wilderness areas.

These wilderness areas are already fairly limited to the American public, but it transports our imagination back to the time of the fur traders and pioneers, and it permits many an adventurous spirit to experience the wonder, beauty and abundant wildlife this continent offered Native Americans and pioneers a few hundred years back.

PREPARED STATEMENT OF ADRIAN D. LEIGHTON, RONAN, MT

Senator Burns: Thank you for requesting the opinion of all Montanans regarding the issue of motorized vehicles in wilderness. Like all forms of recreation, motorized vehicles are important to many people, but that does not justify them being allowed total access to all Forest Service lands.

The Forest Service, as you recently pointed out, is under a mandate for multiple use management. As a forester and college professor, I am keenly aware of the importance of this mandate. However, it is important to point out that multiple use does not mean "everything is allowed everywhere". Logging is not allowed on steep slopes because of potential site damage. Similarly, while motorized recreation should be supported by the Forest Service in appropriate areas, it is not, and should not, be allowed everywhere.

Part of the Forest Service's multiple use mandate is to protect endangered species of wildlife and to provide for their habitat. There are numerous scientifically sound studies that demonstrate the potential negative impact of motorized vehicles on many species of wildlife.

Another part of the Forest Service's multiple use mandate is to provide an experience for back country recreationists that wish to escape the noise, speed and confusion of every day life. A deep and profound element of wilderness is this very separation from "the daily grind". To open up wilderness to motorized vehicles would render this use of wilderness null and void.

I urge you to continue to support wilderness and roadless area designations, and to support the Forest Service's multiple use mandate in its fullest sense.

PREPARED STATEMENT OF GEORGE WUERTHNER, LIVINGSTON, MT

Senator Burns: I was very disappointed with your recent comments before the FS about motorized use of public lands. The major attraction of Montana to me is the abundance of wild country. One of the reasons Montana has superb hunting and fishing is that motorized access is limited. I have lived in Oregon which actually has more elk than Montana. Nevertheless, the elk hunting season in Oregon is only 10 days long. Why? Because there's logging roads all over the entire state. There's hardly a place where an elk get away from roads and hunters.

ATVs belong on roads, not in the backcountry. Montana has 90,000 miles of roads and 30,000 miles of FS roads. There is more than enough access to public lands for machines on these roads.

And what is unique about Montana are its large areas of roadless country. Tell people in Montana that feel there is not enough access to the public lands to go to Oregon—there's tens of thousands of miles of roads leading to every corner of the state. They can have all the terrain they want. But there are few places like Montana. Keep Montana wild.

PREPARED STATEMENT OF JAN BERTELSEN-JAMES, EUREKA, MT

Senator Conrad Burns: I am a born and raised Montana woman of 55 years. I love Montana. I feel Montana's wilderness, wildlands, and quiet mountain trails in our national forests deserve to be protected for future generations. A place where hunting, fishing, traditional family recreation, and Montana history can flourish. "Wilderness" does not limit the ability for citizens to enjoy public lands; instead, it preserves this land so that indeed the land can be enjoyed.

Wilderness is for future generations, so we need to pass it on. Our valleys are filling up with roads, traffic, and subdivisions . . . way too many subdivisions. Developers are developing for dollars and could care less about Montana! Places that we once went to for solitude and quiet are disappearing. These go from the Great Burn to the Rocky Mountain Front. Wilderness safeguards Montana's opportunities to hunt, fish, camp under the stars and hike in the quiet mountain trails. It's a commitment we MUST pass on to our kids. I have a daughter of 24 and she is upset with her favorite hiking places being ravaged by off-trail vehicles by their noise and disruption to the land. We don't need beer cans in the Ten Lakes of Eureka. She feels it should cost out of state people big bucks to move to Montana. She knows that is not possible, but she is truly afraid that all the "land" will be gone or ruined, bought up by out of staters, by the time she'll be able to afford to buy a small parcel. Her beautiful state that she loves will be gone.

The federal government hasn't demonstrated a vision for the future of Montana's wild public lands. Recent forest plans recommend LESS wilderness than the most recent Montana wilderness bill passed by the U.S. Senate (S. 1696), which was sponsored by you, Mr. Burns. The Bush administration has done more to undermine the environment and this earth that sustains us than any other President. In fact, he has done more to ruin America's name in the world than any other President. His administration may just be the downfall of this nation due to the lack of involvement of U.S. citizens, administrative control of media, and the desire of elected officials to get elected again by doing whatever it seems it takes rather than biting the bullet and doing the honorable right thing. That is your fault and ours. I am no longer going to stand silent. I WANT MY NATION TO STAND FOR MOTHER EARTH AND ITS SURVIVAL! This can start at home, the big sky country that I love.

Montana has over 90,000 miles of roads. There are 30,000 miles of roads in our national forests. ENOUGH IS ENOUGH. I live in an area where there are roads, roads, and more roads. They can't be maintained and noxious weeds grow rampant. Montana's neighboring western states enjoy higher percentages of wilderness. Montanans want our heritage of open spaces continued into the future and we deserve it. I would like to see us be leaders in this endeavor rather than hill-billy, gun-toting, snuff-chewing hicks! I am not like that. Why can't Montana take the lead and be proactive about the environment and use resources to produce clean fuels for the future? Why must we dig for coal or mine for oil when that source is non-renewable? Why can't we take the lead? Why must people like you, Mr. Burns listen to individuals that can only think of now and not the future? I want to see our lands used wisely. God gave us the forests to use and harvest but with conservation and the future in mind. We are supposed to be the stewards of the land and its animals. God gave us the intelligence to do so, so why can't we use this intelligence? I do not agree with all the suits that are filed but I am thankful for individuals that can spend their time keeping abreast of what is happening to this state. I am so busy working and trying just to pay the bills that I am not able to do so and that is the problem. I am taking the time tonight to let you know I am a concerned citizen about the state of Montana and this nation and that I don't approve of the present administration and the lies it tells. I want you to THINK and represent what is right for our state AND the rest of this nation.

People say wilderness is not multiple use. I say multiple use is only logging and off road vehicles like snowmobiles and ATV's. If they had their way, they would be EVERYWHERE!!!! That's all we need. Noise, beer can, trash, rutted and destroyed trails and fields, and more noxious weeds. We need for the Forest Service to "expedite" forest travel plans that will establish responsible limits on OVR use. Wilderness is multiple use. It belongs in our rugged mountains along with suitable areas for logging and vehicle traffic.

I am asking you, Senator Burns, to forego polarizing politics. I want to see new leadership. I want you to bring people together to solve this challenge. With creativity and foresight we can keep Montana's quiet mountain trails and wilderness the best of the Old West-alongside the new.

Thank you for your time. Please make a positive difference for Montana and this nation. We, I feel, are near the tipping point of destruction. I know I sound off the

wall. I am a school teacher of 36 years. I now teach in a therapeutic boarding school for adolescent girls in Eureka, Montana. I am not a nut. I am a concerned citizen that feels we are becoming a hateful nation without honor. I want that to change. Citizens need to demand and become more active in this democratic process. I did so tonight. Please think about what is right for Montana, not is this a republican or democratic issue. Let's just do the right thing for the survival of this state in the best way possible . . . for my daughter and hers.

PREPARED STATEMENT OF DONALD J. BURGARD, COLUMBIA FALLS, MT

I live most of the summer in a cabin near the Canadian border and the North Fork of the Flathead River. I strongly disagree with recent statements you made about wilderness not being consistent with multiple use. Folks in Flathead and Lincoln county need wilderness areas close to home. It is especially important, even patriotic, to reduce unnecessary gasoline consumption with the current petroleum situation the way it is. There is no shortage of places for motorized recreation in the Whitefish Range. Contrary to your thinking, I think that not including wilderness designations in Forest Plans would be inconsistent with the multiple use concept. There are certain areas that are absolutely not suitable for motorized recreation. I'd be happy to hike with you in those areas near my cabin to prove my point. I ask that you reconsider your anti-wilderness position that is making it very difficult for your constituents to reach a consensus on multiple use. The best thing you could do for Montana would be to commit to wilderness designation for many suitable areas.

PREPARED STATEMENT OF JOHN WERNER, RONAN, MT

You requested comments on U.S. Forest Use in Montana: My wife and I strongly support wilderness designation wherever possible in our National Forests. It is the only way that some of our multiple use activities can be retained, i.e. XC skiing, berry picking, hiking, camping, fishing, hunting—without the damn roar of snowmobiles, ATVs, jet skis, and a multitude of other motorized vehicles. As it is now, the FS does not have the personnel to monitor motorized vehicle use which often violates current rules and regulations. Also suggest you see Missoulian editorial on December 13, 2005 regards your request for comments. It has some good information.

PREPARED STATEMENT OF JOHN AND GAYNELLE STAMM, ST. REGIS, MT

Senator Burns: At a December 2 Senate Oversight Hearing in Missoula, you are quoted as saying “wilderness limits the ability of folks to enjoy” public lands by limiting the use of off-road vehicles. We live near wilderness and roadless areas, enjoy them in many ways, and disagree with you. Wilderness and roadless areas are vitally important to humans, wildlife, and plant life in innumerable ways and off-road vehicles are, according to many experts, among the most damaging things to these resources. Off-road vehicles belong on roads, period. Wilderness today is multiple use and, due to these important uses, Montana needs more wilderness. Please work to bring people together on these issues instead of playing polarizing politics. Montana is big enough to accommodate many uses in the best place for each.

Thank you for your consideration of our views.

PREPARED STATEMENT OF DR. VICTOR M. DAVIS, RONAN, MT

Senator Burns: At the December 2nd Senate Oversight Hearing in Missoula you questioned why the Forest Service recommends more wilderness when, “wilderness limits the ability of folks to enjoy” public lands by keeping them free of off-road vehicle (ORV) traffic, and wondered if this was consistent with Multiple Use mandates of the Service.

My favorite use of the Forests of my country is hiking and climbing in peace and quiet and finding solace and comfort in God's creation and with his creatures. This is not possible in lands subjected to noise of screaming engines, scars from churning wheels leaving tracks for decades, and toxic exhaust fumes hanging in the air.

We already have 30,000 miles of roads in the National Forests of Montana, and this leaves plenty of opportunity for those who find Pleasure in the use of ATVs and other motorized vehicles.

Roads and their uses in the Forests lead to increased erosion and stream and air pollution. The negatively impacts fisheries and wildlife and game habitat. I believe these assets are worth protecting not despoiling.

I notice your Website letterhead uses pictures of three or four Wilderness scenes. I find it ironic that you have chosen these images to exemplify your public persona, and yet apparently don't appreciate their value and potential fragility. Rather than a romanticized "Last Best Place", I find Montana to be a very real and beautiful land, and so valuable not only to Montana but all of America. I believe that only by preserving as much of this land as Wilderness, unravaged by the intrusions of man and his wrecking machines, can we maintain this reality.

PREPARED STATEMENT OF MICHAEL AND SUSAN SHERMAN, POLSON, MT

Senator Burns: Our beautiful state is a place of wilderness, undisturbed back country with quiet trails, abundance of wildlife and places for hunting and fishing. This is why people move here, this is why real estate companies advertise with beautiful pictures of pristine wild places.

This is why I want my children and grandchildren to be able to look up to the mountains and be able to say the same thing. Our towns here in western Montana are going at a rapid pace with subdivisions, people buying second homes and ever increasing traffic in our valleys. Wilderness designation for our deserving lands is a safeguard that our future legacy will have opportunities to experience quiet mountain hikes, trail rides, or fishing and hunting experiences.

Recent forest plans are recommending less wilderness for our future. We have thousands of miles of roads but less than 4 percent designated wilderness. I believe you promised years ago that you would help Montanans secure more wild places. If you look at the Forest Service's original definition of "multiple use" it does include wilderness as one of those uses.

Yes, there is a place for ATVs but there should also be those quiet places free from their loud noises and the spread of noxious weeds. ATV's spreading noxious weeds are also a real problem for agriculture lands. No farmer or ranchers wants fields of knapweed.

We need to preserve our landscape for the future so that those of the future can say yes our past generations did keep this state the "last best, wild place" in the USA.

PREPARED STATEMENT OF JIM MULLINS, HELENA, MT

Senator Burns: I know you have lots of issues on your mind, but please consider my request. As a former mid-westerner like yourself, I hope you understand the importance of wilderness to all people.

Please support a stronger commitment to Wilderness areas in Montana.

Wilderness is multiple use.

Thank you.

PREPARED STATEMENT OF TOM AND IRENE ERDIE, HELENA, MT

I write this note on behalf of my wife and myself. We are native born and raised Montanans both with long and deep family roots in Montana. We have hiked many miles in the forests of Montana over the last forty plus years and have watched the transition and the impact of motorized vehicles over those forty plus years. The bottom line regarding impact of motorized traffic in the general forest is not good. Anyone that has watched this transition over the years from minimal motorized traffic to what is witnessed "today" has to be alarmed at what must be the expectation for ten, twenty and more years into the future. We as humans don't exist but that we leave a "footprint" showing that we have been there. It then becomes a question of how much of a footprint and in this case, specific to the wildlands. Today's forests and management practices in general prove that over a period of time, the wildlands are in trouble. If you've spent any quality time in the forests (perhaps with a back pack) you know what I mean. More wilderness is part of the solution. You allegedly have stated that ". . . wilderness limits the ability of folks to enjoy public lands . . ." I agree and would state that the key word is "limits." There has to be some kind of limit. Limiting motorized vehicles is a very big part of that because it can be shown that too many using motorized vehicles in the forests, without limitation, just don't care enough about what we leave for the next generation. I'd welcome the opportunity to take you for a walk in the woods and show very specific

proof of where we are headed with today's practices, the negative impacts, and for the most part how it comes from motorized traffic. We can't hike as we did twenty years ago, nor would we expect to hike ten years from now as we did just this past summer. We will accept some limits, and the answer is not to "jump on a motorized vehicle" to take us anywhere we want to go. We believe there is room for multiple use while initiating more limitations that will not detract from the next generations ability to enjoy the solitude brought by additional wilderness. Thank you for the consideration.

PREPARED STATEMENT OF GONNIE SIEBEL, BOZEMAN, MT

Senator Burns: I'm stunned by your apparent statements at a recent Senate Oversight Hearing in Missoula, regarding wilderness and protection from motorized use for roadless areas. I would like to remind you that a very important source of income in your home state nowadays is from tourism and tourism industries, the reason being that environmental protections have kept some important areas in our state reasonably pristine for the last several decades. Tourists (and most Montanans) don't hike, camp, fish, float, hunt, etc. in areas trashed by high impact uses! People can do that in their home states where, by lack of foresight decades ago, few places have been spared the impacts from road building, developments, extractive industries and ORV use. Usually where there are roads, negative impacts follow.

To maintain our precious lifestyle for present and future generations, Montanans need Montana's undeveloped landscapes to remain as they are to find quiet and solitude. And, obviously, people from other states like what we still have in Montana! Wilderness belongs in our rugged mountains along with suitable areas for logging and motorized traffic. This IS multiple use.

The most recent Montana Wilderness bill passed by the U.S. Senate (S. 1696) and co-sponsored by you, Senator Burns, recommended more wilderness than recent forest plans. At present less than 4 percent of Montana is actually protected as Wilderness. Montana's national forests have 30,000 miles of roads. ORVs and motorized vehicles do not belong on quiet mountain trails and even if they move on designated roads they affect an area widely beyond their location.

Senator Burns, I urge you to support the National Association of Counties' call for the Forest Service to "expedite forest travel plans that will establish responsible limits on ORV use, to prevent more spread of weeds and other damage from ORV traffic." I urge you to provide new leadership and bring people together to solve Montana's problems. With cooperation, creativity and foresight, we can keep Montana's best, it's quiet mountain trails and wilderness, alongside the new.

Thank you for your attention to such an important issue to Montanans!

PREPARED STATEMENT OF HENRY LISCHER, NYE, MT

On December 2, you asked of the Forest Service whether wilderness areas limit the ability of the public to enjoy public lands.

I believe that public lands should support many different uses, but unspoiled wilderness is one of those qualifying uses. We should preserve our wild lands for the enjoyment of those who do not wish to be in public lands involving less natural settings, and we should preserve wild lands for future generations, which certainly will involve ever-growing populations.

Thank you.

PREPARED STATEMENT OF JOE HAMILTON, HELENA, MT

Senator Burns: In your response to a December 2 Senate Oversight hearing in Missoula, you asked why the Forest Service recommends tracts of Montana Wilderness when in your words you stated, "wilderness areas limit the ability of folks to enjoy" public lands by keeping mountain areas free of off-road vehicle traffic. You questioned whether wilderness and motor free areas are "consistent with the multiple use mandate" of the U.S. Forest Service. I would like to respond. I just moved here from Arizona. I lived there for most of my life. Arizona is growing at a rapid pace and as immigrants and "out of staters" continue to move into that location, rapid growth means that public lands (that allow vehicles) continue to grow. If you have ever camped, mountain biked; hiked in any forest area in Arizona you would eventually run into an ATV, truck, or car full of people traveling down a road any where from 15-50 mph. My point here is as states grow so does public use of forest areas. Why expose MT wilderness areas in attempt to meet some political agenda?

Opening up wilderness areas opens up all kinds of problems. I clearly understand the detrimental impacts that roads have in wilderness areas. I was a tour guide in the Grand Canyon.

I recently moved to Montana to be able to drive in my truck, park at a wilderness area and hike in and enjoy the serenity of Montana. It bothers me enough that this beautiful state has over 90,000 miles of road, 30,000 miles of roads in our national forest, but less than 4 percent of Montana is actually protected as wilderness. All of Montana's neighboring western states enjoy higher percentages of wilderness. Why close these wilderness areas up and open to roads. It makes no sense as a senator, citizen, president, or even God. Please provide leadership in this area. It is critical to the intrinsic value of Montana wilderness. Please read Aldo Leopold's book "Sand County Almanac". I think it will be instrumental in all of your environmental support and assist you in foregoing polarizing politics.

The federal government has not demonstrated a vision for the future of Montana's wild public lands. Recent forest plans recommend fewer wildernesses than the most recent Montana wilderness bill passed by U.S. Senate (S. 1696). Please bring new leadership by bringing people together to solve our problems. With creativity and foresight we can keep Montana's quiet mountain trail and wilderness—the best of the Old West—alongside the new.

PREPARED STATEMENT OF MR. AND MRS. DONALD SNOW, KALISPELL, MT

Senator Burns: Wilderness is for now, tomorrow and as long as people are around to enjoy it—more is better in Montana.

The biggest attraction of Montana is the amount of wilderness it has. Reducing that amount would be VERY short sighted. With one third of Montana's roads are in National Forests, we need more wilderness and less roads. We advertise our naturalness, big animals, numerous high mountains, clean air and water and beautiful landscapes, which draws worldwide visitors and proves the point.

Montana needs much more wilderness, areas to visit where motorized vehicles are prohibited and are not contaminated with exotic, invasive, noxious plants brought in via motorized transportation.

Please lead us to a solution which considers what is best in the very long term for Montana and its citizens—multiple use, sensible and very long view of Montana's beauty.

PREPARED STATEMENT OF JOEL VIGNERE, LAKESIDE, MT

Sir: Montanans deserve and want MORE Wilderness. Wilderness is consistent with multiple use. Wilderness does not ". . . limit the ability of folks to enjoy" (your words) our public lands. To the contrary, it enhances my friends and neighbors and my enjoyment of our public lands. It is valuable to me because I know I will be able to get away from the stench and noise of motorized recreation. Hopefully this legacy will remain for my children and theirs also. There are thousands of acres in Montana that deserve the protection of designated Wilderness. I urge you to help provide the necessary leadership to bring about a solution to the polarizing politics that have accomplished virtually nothing. Let's work together for the betterment of Montana's future.

PREPARED STATEMENT OF DR. RICK MORONEY, BOZEMAN, MT

Senator Burns: I am requesting that you support the preservation of all roadless lands in Montana. Please seek wilderness designation for all remaining federal lands that qualify. This is probably the best thing you can do for the long term economic welfare of Montana. These roadless lands are one of the things that sets Montana apart from the rest of the nation. A large segment of the population values these lands, and would like to live in close proximity to them. These people often move their businesses to Montana, or increase commerce in other ways.

In regard to roaded lands; Please see that federal agencies have enough funding to properly enforce their motorized regulations. It is unfortunate, but a few thoughtless motorized users don't follow the rules, causing great damage to our lands. The scars that they leave contribute to increased weeds, erosion, and degraded water quality. Perhaps it would be wise to severely limit motorized access until mechanisms are in place to protect the land. Please observe that almost without exception private landowners, allowing public access, almost always restrict that access to

non-motorized use, only. Why should we accept a lesser standard for publicly owned lands. Thank You for your efforts on behalf of Montanans.

PREPARED STATEMENT OF GEORGE DURKI AND LIAM, BOZEMAN, MT

Senator Burns: Greetings from Bozeman, Montana. Just a short note following your recent Oversight Hearing in Missoula concerning U.S. Forest Service policies particularly wilderness designation and travel plans!!!!

I am the Gallatin County Road Engineer and have been for the last four years. I cannot tell you the number of subdivisions I have personally reviewed, both five lot minor and up to 300 lot major subdivisions.

This place is bursting at the seams, and a large percentage of these new residents recreate in the Forest. We need as much of the forest kept pristine and actually designated WILDERNESS to keep MONTANA a great place to live for our kids and grandkids.

I get into the mountains and high alpine meadows to escape the growth and hectic lifestyle that is coming to our major cities due to increased development. Please LISTEN, we need QUITE trails were people can get away from the noise and machines that are quickly taking over our beautiful valleys. I have personally seen motorcycles and ATV's off-trail and ripping up high alpine meadows for the hell-of-it!!!! These off road machines belong on the vast network of Forest Service and logging roads, NOT ON TRAILS!!!! The Forest Service does not have the staff to police the bad apples that go off-trail, therefore creating new routes for the machines to follow.

The hunting/fishing/backpacking/horse-packing traditions are much to valuable and cherished by all Montanans to only be ruined by rampant ATV and motorcycle riders. Keep them at lower elevations and out of the fragile alpine areas before it is too late.

Thank you for your time. Do the right thing, save and create more WILDERNESS, that is what people want and keeps them coming back to MONTANA!!!!

PREPARED STATEMENT OF KIP DROBISH, KILA, MT

As the last truck loads of the last low elevation unlogged stands of Ponderosa pine and Larch on the mountain behind my house are hauled away today, I am struck by how short our lives are and how narrow our vision can be. The children and their children will never know 300 year old forests. In fact the residents of the Flathead already forget the entire valley was once covered by mature Ponderosa, Larch and Douglas Fir. So to will future citizenry forget there were once large old trees in the mountains west of Kalispell. Your great grandchildren will think saplings are old trees and harvest them for fiber laminated beams for construction, that is until the weakened forest soil will not support trees much like a mule that refuses to pull a plow after being deprived food. This is not nonsense, just as wilderness is not wasted land that should be open to motorized recreation. Wilderness is the one place held back so your great grandchildren can show their kids what it was once like back before their great great grandfather sightlessly encouraged industrial forest practices on the public trust lands.

Please, if you can't get a glimpse of where we are going with an economy that is only healthy when it is expanding and consuming more, then please take a vacation and visit some wilderness, where the economy has been stable since the last Ice age and it remains robust.

PREPARED STATEMENT OF PETER MARKALUNAS, GREAT FALLS, MT

Senator Burns: I have to voice my strong disagreement that non motorized use is in conflict with the multiple use mandate of the forest service.

Wilderness designation prohibits motorized use but enhances all activities that favor quiet trails: hiking, fishing, horseback riding, photography, hunting, cross country skiing.

Instead of thinking about how wilderness designation prohibits motorized use we should be thinking about how motorized use prohibits all the activities that require quiet trails.

PREPARED STATEMENT OF CHRISTINE DAUM, STEVENSVILLE, MT

Senator Burns: You've recently made a comment that wilderness limits the ability of folks to enjoy public lands by keeping certain areas free of off road vehicles.

I disagree with you. It saddens me that so many cannot enjoy the outdoors without an internal combustion engine.

As for myself, and many of my friends—we would prefer the silence and peace that the wild has to offer. We enjoy canoeing, skiing, hiking and fishing without the drone of snowmobiles or ATVs. The recreation we enjoy is traditional and too valuable to spoil. I hope you will support measures to keep it that way.

Thanks for listening.

PREPARED STATEMENT OF GEORGE W. CECIL, KALISPELL, MT

Senator Burns: At a Dec. 2 Senate Oversight Hearing in Missoula, you questioned whether wilderness and motor-free areas are "consistent with the multiple use mandate" of the Forest Service.

My response to your question is:

1. Wilderness IS multiple use, and belongs in our rugged mountains along with suitable areas for logging and vehicular traffic.

2. Wilderness designation is for the future. It safeguards Montana's opportunities to hunt, fish, camp under the stars and hike quiet mountain trails. It's a commitment we must pass on to our children.

3. We need to do more for the wild landscape, NOT less. Recent forest plans recommend less wilderness than the most recent MT wilderness bill passed by the Senate—and co-sponsored by you.

4. Less than 4 percent of Montana is actually protected as wilderness. All of MT's neighboring western states enjoy higher percentages of wilderness. Montanans want our open space heritage continued, not downgraded.

5. ATVs and other motorized vehicles belong on roads, of which there are thousands of miles available, NOT on quiet mountain trails.

6. It is your responsibility to ALL Montanans to forego polarizing politics and provide new leadership to solve our problems, not add to them.

Thank you for considering my comments.

PREPARED STATEMENT OF ANNE BANKS, BOZEMAN, MT

Senator Burns: The Multiple Use-Sustained Yield Act states that national forests shall be managed for outdoor recreation, range, timber, watershed and wildlife and fish purposes and that "areas of wilderness are consistent with the purposes and provisions of this Act." Wilderness is one of the allowed multiple uses.

Furthermore, the Act does not require that all uses occur simultaneously in one place; instead it requires "harmonious and coordinated management of the various resources, each with each other without impairment of the productivity of the land . . ."

I am most familiar with the Gallatin Forest Travel Plan, which has clearly addressed these issues. Its primary focus is on the resource itself, and recreational activities are considered in their relation to their effect on the forest and on each other. There was ample opportunity for public input. Although I do not agree with every provision in the plan, I firmly believe that its development and content adhere to the requirements of the Multiple Use Act. There is a balance between motorized and non-motorized uses. This is the first time motorized use has been regulated at all, and the reason for any "losses" is to protect the productivity of the forest, as the Act requires. FS Chief Bosworth recognizes unregulated off-road motorized use as one of the four greatest threats to our forests.

I hope you will let the plan stand without further pressure from Congress. It was developed locally, on the ground, by the people most involved, and we will be the ones most affected by it.

PREPARED STATEMENT OF WOODY NEDOM, BIGFORK, MT

Senator Burns: Thank you for your interest in the classification of Forest Service lands. Most citizens in our state, and countless others elsewhere, recognize that it is the stunning topography, rare flora and fauna, and unique beauty of the wilderness we have preserved that has made Montana "The Last Best Place". I know you

agree because not one of the magnificent scenes that banner your website has a road or vehicle in sight.

Adding wilderness preserves, enhancing safeguards for their protection, and formulating Forest Service policy to these ends ought to be your number one priority and will be the greatest and most cherished legacy of your senatorial tenure.

No one is fooled by the unadulterated sophistry which argues that wilderness protection limits the ability of people to enjoy public lands. Montana has over 30,000 miles of roads in its national forests; less than 4 percent of the state is protected as wilderness. If 96 percent were wilderness and there were no roads in the national forests, the multiple use enthusiasts would have a point.

I know you will bring honesty and common sense to the table. The multiple use advocates have far more than a reasonable share of our resources.

PREPARED STATEMENT OF LYNN KELLY, POLSON, MT

Senator Burns: You asked for input regarding the importance of wilderness and I would like to share my thoughts. Wilderness is probably the most "multiple use" of all the land uses out there. Here are some things wilderness does for us:

(1) Wilderness protects and maintains water quality. Other states would kill to have their water sources protected as the Swan, South Fork and Middle Forks of the Flathead are protected by wilderness areas. This is worth billions of dollars.

(2) Wilderness provides a clean "airshed". Again, worth billions of dollars.

(3) Wilderness provides jobs as outfitters and others use these lands in their traditional ways.

(4) Wilderness provides habitat for multitudes of wildlife species.

(5) Wilderness provides "natural science laboratories" so that comparisons can be made between disturbed and undisturbed habitats, watersheds, airsheds, etc.

(6) Wilderness gives our children and grandchildren a chance to see "how it was" back then.

(7) Wilderness provides places for spiritual renewals and retreats. There are at least 5 other major "uses" of wilderness but my memory fails me. Needless to say wilderness is not just another cornfield! "Man always kills the thing he loves, and so we the pioneers have killed our wilderness. Some say we had to. Be that as it may, I am glad I shall never be young without wild country to be young in. Of what avail are 40 freedoms without a blank spot on the map?" Aldo Leopold.

We need more wilderness—not less!

Thanks for asking for my thoughts.

PREPARED STATEMENT OF BRUCE GRANGER, BOZEMAN, MT

Dear Senator Burns: As a long-time Montana resident, I strongly support the preservation of the wild areas in this state. It makes no sense to allow additional degradation of these areas by ORV use. Quiet trails, abundant wildlife and natural flora will be there for us and future generations only if they are not destroyed by increased road building and ORV use. I strongly support more wilderness rather than less, to perpetuate what's really special about this region.

PREPARED STATEMENT OF CHRIS KAPPES, LOLO, MT

Dear Senator Burns: I attended the Oversight Hearing in Missoula. There were comments made by the Wilderness Association President that gave me hope that Wilderness is important and will not be squandered on exploitation of any kind.

I am a 7th generation Montanan and want the Wilderness kept for the next seven generations. Wilderness safeguards opportunities to hunt, fish, hike, camp, and ride horseback on the quiet mountain trails. There are few opportunities left as our valleys become populated.

ATV's belong on roads and goodness knows there are plenty (of both). Wherever I go, and there has been ATV use, I am disheartened by the incredible damage that they cause on and off trails. Please keep the pristine areas pristine!

Please, Senator Burns, find a way to keep Montana's quiet mountain trails and Wilderness. The generations to come will honor your name!

In hope and peace.

PREPARED STATEMENT OF DAVID AMNOTTE, BIGFORK, MT

Senator Burns: I am writing to express my views on U.S. Forest Service Policy. We need to pass on to our children our great State wilderness legacy, we need to keep this land safe from road building. In this state we have a heritage of hunting and great wildlife habitat let's preserve it. Montana already has over 90,000 miles of roads 30,000 in the forest that's plenty. Our State has less than 4 percent of it's total as Wilderness, all of our neighbors have more. Motorized travel needs to remain on roads, trails need to be reserved for traditional uses, hiking, horseback riding, and foot travel during winter months to preserve wildlife habitat. Wilderness is Multiple Use, rugged mountains along with low elevation areas for vehicles and logging. We need to have leadership, not Polarization, we need to bring people together to solve problems not push them apart. Please keep these thought in mind when considering Forest Policy.

Thank you.

PREPARED STATEMENT OF PAUL PACINI, HELENA, MT

Senator Burns: As a native born Montanan, I am writing to express my disagreement with your assessment of the importance of wilderness in Montana and for that matter, through out the world. The human environment is rapidly becoming a scene of endless and hurried technology for the purposes of business, health care, shopping, education, even recreation, and more. More and more we are living in an artificial electronic environment and pressured to accomplish more than before. The human species, like any other species of animal on the Earth evolved from a natural environment. Our bodies and minds relate to the natural world which tends to rejuvenate our technology wearied selves.

All of this may sound naive or just too warm and fuzzy to some, but the fact is that we need wild areas for our collective sanity. By "paving over" our planet, we are paving over our humanity! Don't allow federal lands to be sold.

PREPARED STATEMENT OF MIKE AND STEPHANIE BECKER, HARRISON, MT

We want you to know that wilderness does NOT limit the ability of folks to enjoy public lands! With the crush of modern life with its traffic, development, noise, and population pressures, the American public is seeking solace and quiet recreation in our preserved lands. Montana can still offer some beautiful, undisturbed areas and we need to PROTECT and PRESERVE these precious—and diminishing—wild resources for future generations. Montanans deserve more than a mere 3 percent of protected wilderness! 30,000 miles of roads in our national forests is more than enough. And we urge you to support the National Association of Counties' call for the Forest Service to expedite forest travel plans that will establish responsible limits on ORV use—ORVs do NOT belong on quiet mountain trails. Their abuse is spreading noxious weeds in our counties. Please work to keep Montana's beautiful wild lands special: Montana's growing tourist economy as well as the economic support of its new residents really depend on selling the UNIQUENESS OF MONTANA'S WILDERNESS AREAS. People are not coming here to see "more of the same" that they left in other states that have spoiled environments. Montana's future can be bright and prosperous with leadership that understands the enormous value of growth with conservation.

PREPARED STATEMENT OF BETH WEISSMAN, LIVINGSTON, MT

I strongly feel that we must preserve the Wilderness. Montana is developing and sprawling and only the wilderness spaces will be left of the greatness of Montana's open spaces. They must be saved for the future. Roads, motorized vehicles, ATV's: these represent the opposite of what we should be protecting. We need quiet places to hike, fish, hunt, camp, where animals can live without noise. We have enough roads in this state for motorized vehicles; let's save the wilderness.

PREPARED STATEMENT OF JIM FIDDLER, BIGFORK, MT

Senator Burns: I have traveled to all 50 states and many foreign countries and lived in some of the largest cities in the United States From my perspective, there is no shortage of roads on which to drive motorized vehicles. Even in Montana, a state with a higher percentage of wild lands than most, there is only a very small

portion where one can go to enjoy a peaceful experience without the possible disruption from some form of motorized vehicle.

Of all the places I have lived, I have never had more friends or relatives visit me than I have since living in Montana. They don't come here because they have heard that we have incredible roads or places in the forest where they can drive an ATV. They come to enjoy the quiet, unspoiled beauty of nature. When a person hikes through the woods, very little disturbance occurs. When someone rides any motorized vehicle through the woods, a great deal of disturbance occurs. The sound can literally intrude on people miles away. The impact to the ground itself from just one set of tires is greater than 100 people walking that same trail. The pollution from small vehicles is usually even worse than our cars which are bad enough. Vehicles belong on roads, not in the forest, and there is no shortage of roads. There is a very real shortage of places left that have not yet been forever altered by a road.

PREPARED STATEMENT OF ROCKY HECKMAN, CHOTEAU, MT

Senator Burns: Have you fell on your head? Don't even think about opening up wilderness areas to motorized travel, oil or mineral exploration, or any thing like that. C'mon get a reality check, these precious wilderness areas are only a speck on the map, there is plenty of land in Montana that nobody gives a rip about. Go ruin that, if it makes you feel good, not an area so many of us care about, just to appease the greedy. Please do not respond to this message with a sales pitch type "bla, bla, bla" response that tries to convince me that you know what you're talking about. I don't, cause it's crap, and proves only that you're out of touch with Montanans such as me.

Happy holidays.

PREPARED STATEMENT OF DR. DOROTHY STARSHINE, GREAT FALLS, MT

Conrad Burns, Senator: In 1955, our family moved to Montana so we could hunt, fish and hike in these glorious wilderness areas. However, if quiet areas continue to shrink, our 18 grandchildren will not have the experiences that our family experienced only 50 years ago.

Please use your power to protect the wild areas with Wilderness designation to prevent roads and subdivisions.

PREPARED STATEMENT OF JACK WALLER, WHITEFISH, MT

Senator Burns: We are writing to help answer your questions regarding why the Forest Service recommends tracts of Montana wilderness and motor-free areas—from just two ordinary Montana residents—we're not a big business, not lobbyists, and don't belong to an Indian reservation. We just enjoy the state's national forests as they are—except for the encroachment of machines and more roads.

Our wilderness areas and proposed wilderness areas are even more important to preserve and protect as our valleys fill with more people, development, roads—preserving these areas will be so much more valuable as we see our public lands being sold off, drilled into, mined, etc. 30,000 miles of roads in our national forests yet only 4 percent of Montana is actually protected. This is shameful.

Our national forests are already multiple-abused—motorized vehicles i.e. ATVs just take the joy out of a fair—big game hunt with your children, a hike with your friends, a solitary day of fishing—this to us is what Montana has always been about—wild areas—it's what makes Montana stand out from the rest of the country.

We need to bring people together to solve our problems—creativity and foresight. We need to provide new leadership to keep Montana's quiet mountain trails and wilderness.

You, Mr. Baucus, and Mr. Rehberg should shed your Washington, DC skins and start spending some time in our national forests—we suggest areas where machines are already allowed, and just try and enjoy the surroundings. Then, you should go to a wilderness, roadless area and compare. If you haven't done this in a while, you should. Then you'll know why the majority of Montanans don't want motorized use in our national forests.

Happy holidays.

PREPARED STATEMENT OF LAURIE GAISER, WHITEFISH, MT

Senator Burns: We are writing to help answer your questions regarding why the Forest Service recommends tracts of Montana wilderness and motor-free areas—from just two ordinary Montana residents—we're not a big business, not lobbyists, and don't belong to an Indian reservation. We just enjoy the state's national forests as they are—except for the encroachment of machines and more roads.

Our wilderness areas and proposed wilderness areas are even more important to preserve and protect as our valleys fill with more people, development, roads—preserving these areas will be so much more valuable as we see our public lands being sold off, drilled into, mined, etc. 30,000 miles of roads in our national forests yet only 4 percent of Montana is actually protected. This is shameful.

Our national forests are already multiple-abused—motorized vehicles i.e. ATVs just take the joy out of a fair—big game hunt with your children, a hike with your friends, a solitary day of fishing—this to us is what Montana has always been about—wild areas—it's what makes Montana stand out from the rest of the country.

We need to bring people together to solve our problems—creativity and foresight. We need to provide new leadership to keep Montana's quiet mountain trails and wilderness.

You, Mr. Baucus, and Mr. Rehberg should shed your Washington, DC skins and start spending some time in our national forests—we suggest areas where machines are already allowed, and just try and enjoy the surroundings. Then, you should go to a wilderness, roadless area and compare. If you haven't done this in a while, you should. Then you'll know why the majority of Montanans don't want motorized use in our national forests.

Happy holidays.

PREPARED STATEMENT OF DR. STEVE SENINGER, MISSOULA, MT

Senator Burns: I participated in all of the Missoula Ranger District, Lolo National Forest plan revision meetings this summer. A wide range of forest users were present at the tables including folks who were interested in ATV/OHV use, snowmobiles, logging, hunting, hiking, and other interests. The meetings produced useful dialogue and the results were summarized by us participants and provided to Forest Service as public input. I feel that the Lolo National Forest staff were very efficient and fair and used the input provided by all groups and kinds of users of our national forests. I personally want to see more protection of our public lands and our road less areas which now comprise a very small portion of our overall public lands here in Montana.

I am a resident of Missoula, a taxpayer, and a registered voter and I will continue to support political candidates who work to keep Montana lands open to all with adequate protection for hunters, fishermen, trail riders, hikers, skiers and other non-motorized uses. I appreciate you holding the December 2 hearings in Missoula which I attended and urge you to work for protection of one of Montana's greatest treasures, our mountains and public lands.

PREPARED STATEMENT OF EILEEN SCHWANEMANN, MISSOULA, MT

Dear Senator Burns: It was interesting going to my first Senate Committee Hearing. I was sorry that not even fifteen minutes was allotted to comment/questions from any of the many attendees.

The issue of logging in national forests certainly needs to be addressed and procedures changed some. Who would be the responsible persons to facilitate this process? Certainly the public who own' this public land should be involved. I agree that certain groups are tying the whole process of any type of logging up in expensive lawsuits only the lawyers win. What can end or limit this?

The other subject discussed at the meeting was motorized use in the forests. At several of the Forest Planning Meetings in Missoula this summer, it was suggested that motorized vehicles belong on roads. There are certainly many roads in many of the forests. I realize that many people have these vehicles. But I do not think ATV's, Four Wheelers, and the like should be on trails where people walk, hike, or bike. There are obvious safety factors involved here. Not to suggest banning them, but snowmobiles are both extremely noisy and polluting. One last comment on this issue.

There is a quiet in the woods, a silence that the soul alone can hear, as if all of nature knew and understood, what a precious resource this is. (Some credit for this goes to Leanin, Tree Cards.)

Thank you for your consideration of this matter.

PREPARED STATEMENT OF DAVID ROCKWELL, DIXON, MT

Senator Conrad Burns: You questioned the need for wilderness when you were in Missoula on Dec. 2. Please remember that Montana has over 90,000 miles of roads. Less than 4 percent of Montana is protected as wilderness. We need wilderness as a people; it is part of who we are as Montanans! It is part of our heritage and should be part of the legacy we leave future generations. There are lots of places to go to drive off-road vehicles, few places where you can enjoy the peace and tranquility of a roadless environment.

ATVs and ORVs belong on designated roads because they when used inappropriately they cause erosion, disrupt wildlife and harm fish (with the silt they produce). They can damage resources that belong to all of us.

Wilderness is multiple use. It provides for clean water for our communities, outdoor recreation, range (through leases), and fish and wildlife. The language of the Wilderness act even states that the purposes of the Wilderness Act are within and supplemental to the Multiple Use Sustained Yield Act (MUSYA). The only use mentioned in the MUSYA that wilderness does not include is timber. But if every acre of every forest had to provide all of the multiple uses identified in the MUSYA, we would have an impossible task before us.

Please support wilderness designation for our remaining roadless areas. Thank you.

PREPARED STATEMENT OF KATHY LLOYD, CLANCY, MT

Senator Conrad Burns: We were not able to attend the Senate Oversight Hearing in Missoula on December 2 and were shocked and upset to hear about the comments you made concerning roadless areas in Montana. We are, frankly, very concerned to be represented by someone who has to have these things explained. You, of all people, should realize the value placed on our natural heritage, quiet places, excellent hunting and fishing opportunities, and unspoiled beauty, not only by the people of Montana, but by people throughout the country and the world. The American public showed overwhelming support for the Roadless Conservation Initiative because we knew how precious these areas are now, and how much more precious and unique they will be in the future.

Montana is criss-crossed by over 90,000 miles of roads, while only 4 percent of the state is protected as Wilderness. As more of the natural landscape in Montana is turned into subdivisions, roads, and noise, Wilderness will become even more important. We want our kids and their kids to be able to enjoy the natural landscape of Montana, a landscape that is bragged about and advertised as special. Our economy is, to a large extent, fueled by our image of unspoiled beauty, and that will be even more the case in the future if unthinking people don't degrade the reality.

We want you to support the National Association of Counties and tell the Forest Service to establish limits on motorized use in the backcountry. Motorized vehicles belong on roads, not on quiet, family hiking trails. The damage, erosion, spread of weeds, and conflicts generated by ORV traffic is undeniable and must be managed. As to your question about multiple-use, the principle is applied to the forest as a whole; it does not mean that every inch of ground is open for every use.

Now is no time to play politics. There is too much at stake. If we don't act now what we all love about Montana will be overrun with roads, noise, pollution, weeds, and concrete.

Thanks.

PREPARED STATEMENT OF CATHERINE HAUG, BIGFORK, MT

Senator Burns: I'm writing to urge you to keep Montana's wild areas free of roads, ATVs and snowmobiles, by working with the U.S. Government to preserve more areas as wilderness. You have stated that you believe "wilderness limits the ability of folks to enjoy" public lands by prohibiting access via roads and off-road vehicle traffic. But you are missing a critical point with this argument. That is, opening access to wild areas via automobiles and off road vehicles, removes the "wild" from the areas. Far better to enjoy these remarkable areas by horseback or by hiking the trails. Vehicular traffic is polluting, noisy, and visually obtrusive.

Please help preserve Montana's glorious back country for our children and generations that follow. Preserve this wilderness as a safeguard for hunting, fishing, hik-

ing and cross-country skiing the quiet mountain trails, and camping under the stars.

I live near Montana's spectacular Jewel Basin, one of the most popular hiking areas in the west, and have spent many wonderful summer days and nights hiking and backpacking in the Basin and to the top of Mt. Anaeas. I would be devastated to see this area ruined by roads and ATVs.

Recent forest plans recommend even less wilderness than the most recent Montana wilderness bill passed by the U.S. Senate (S. 1696), which was cosponsored by you. People across the country think of Montana as the "Last Great Place," one of the last wilderness states (along with Alaska), and yet Montana has lower percentage of wilderness (at 4 percent) than our neighboring western states!

ATVs and other motorized vehicles belong on roads, not on quiet, pristine mountain trails. We need to establish responsible limits on off-road vehicle (ORV) use, to prevent the spread of weeds and other damage from ORV traffic.

Wilderness is needed to promote the growth and breeding of beloved yet often endangered wildlife. Connected corridors of wilderness are especially needed to ensure genetic integrity and prevention of inbreeding.

I urge you to provide new leadership on this issue of wilderness. Please forego polarizing politics. Bring people together to solve our problems, and to keep our wild areas—the best of the Old West—alongside the new.

PREPARED STATEMENT OF DUDLEY IMPROTA, MISSOULA, MT

Senator Burns: I received a card announcing the Senate Hearing in Missoula Dec. 2, 2005. I attended. With all due respect I believe our forests and wildlands should be managed differently than a cornfield in Iowa.

My comment on the Region 1 plans would be to save all roadless areas that are now designated that way. Governor Schweitzer recently met with all county commissioners in Montana. Their opinion was that no new roads were needed at this time. They did say that it may be necessary for new roads in a time of emergency such as fighting wildfire.

I would agree that it is time to take a close look at NEPA and perhaps update those laws to reflect the current state of land management.

Please don't vote to sell public land or promote development of lands that are now protected. Many Montanans put up with lower wages in order to enjoy wild public lands.

One such area is Forest Service land near Missoula and Lolo Peak. We have 13,000 acres of primitive and roadless lands that buffer the development of Missoula and the BitterRoot Valley from the majestic Selway-BitterRoot wilderness. We all know what is eventually going to happen to private land in this area. Some would develop this public land given the chance. If we care about outdoor recreation, hunting, fishing and the Montana lifestyle; we will work to protect these areas.

Thanks for your consideration.

PREPARED STATEMENT OF SUZANNE LUEPKE, POLSON, MT

Senator Burns: Little by little roadless areas are being encroached on and our wild lands are being decreased. We already have at least 30,000 miles of roads in Montana's National Forests. We need responsible leadership that recognizes the value of wilderness, not only for individuals but also for the good of our communalities in terms of CLEAN AIR and CLEAN WATER.

I hope that you will think about the future and do what is right.

Also, I want to thank you for taking the time to investigate this issue.

PREPARED STATEMENT OF JULIETTE CRUMP AND BILL BEVIS, MISSOULA, MT

Senator Burns: I was appalled at your comparing our forests to a corn field. A corn field is privately owned and farmed for profit. Our national forests are publicly owned and managed for multiple uses.

We need more wilderness rather than less for our future Montana citizens. I have noticed over the past few years in the Beaverhead National Forest and the Lolo National Forest that more and more motorized vehicles are going off roads and this means habitat is destroyed and weeds are spread by these vehicles. That's why we need the Forest Service to recommend tracts of Montana wilderness, for protection of pristine areas that my grandchildren can enjoy.

The Forest Service has provided ample areas where snow mobiles and ATVs can go, such as Lolo Pass where my friends and I cross country ski (with snow mobiles on some trails) every Wednesday during winter. We need you to support the National Association of Counties call to place responsible limits on ORV use. Wilderness protection will help do this.

I urge you to do everything you can to preserve Montana's heritage of open spaces.

PREPARED STATEMENT OF DAVID SCHAUB, HAVRE, MT

I do not favor increasing motorized use of National Forests. Less than 4 percent of Montana is actually protected as wilderness. Our roadless, non motorized wilderness areas are the womb of Montana's quality environment that is attracting well paying, environmentally friendly business to our state. I have health issues that likely will prevent me from hiking into some areas that I once traveled. I reject the idea of driving a 4 wheeler into those wild, roadless, quiet areas. I want them left as is for my children and grandchildren. Not only do we need to keep the few non motorized wilderness areas that we have, we need to achieve some equalization and increase the wilderness areas. There are plenty of other areas that I can access by pick up or 4 wheeler.

PREPARED STATEMENT OF VANELLE NURSE, MISSOULA, MT

Senator: You mentioned at the 12/2 Senate Oversight Hearing in Missoula that you believe "wilderness limits the ability of folks to enjoy" public lands. I strongly disagree. I love to hike in our wilderness areas. As a senior citizen I realize there will come a time in the near future when I may not personally be able to access the areas I have enjoyed for decades, but I would like to believe they will be kept safe and pristine for our children and grandchildren. All motorized vehicles belong on roads, including ATVs. Mountain trails are not a place for the noise and damage these vehicles create. Please support the National Association of Counties' call for the Forest Service to expedite forest travel plans to establish responsible limits on off-road vehicle use, to prevent the spread of noxious weeds and other damage from ORV traffic. Please continue our heritage of open space for the future of all Montanan's. Please save our wild public lands.

Thank you.

PREPARED STATEMENT OF MARY O'BRIEN, POLSON, MT

Senator Burns: I am writing to state my opinion that wilderness is consistent with the multiple use mandate of the U.S. Forest Service. Wild places deserve an equal place among those areas set aside for logging, vehicle traffic, etc.

Montana has more than 90,000 miles of roads, but less than 4 percent of our unique state is preserved as wilderness. All of Montana's neighboring western states have seen fit to set aside greater percentages than that. We Montanans want to pass a heritage of open spaces on to our children, but to do so we must be foresighted enough to set them aside now.

Thank you for your attention to my comments.

PREPARED STATEMENT OF COLLEEN MERCER, GREAT FALLS, MT

Until I started hiking in the local mountains, I didn't understand the complaints about motorized vehicles.

Now because I've actually used our public lands, I realize the threat.

On July 4, my husband and I took an early morning hike in the Little Belts along Jefferson Creek. Then, the vehicles joined us. We quit, and returned to our car because of the smell of the constant traffic, and stopping to allow them to pass. It was a real surprise how many are on the trail—too many to allow hikers to walk along.

In the fall, I joined a group of women on the trails out of Utica. We found it impossible to follow the detailed Forest Service map because there were so many off road tracks running EVERYWHERE, despite signs indicating no motorized traffic.

We need to regulate this activity, and enforce the regulations! Our undisturbed lands are a resource, key to our state's prestige. Thank you.

PREPARED STATEMENT OF JANET TATZ, HELENA, MT

Dear Senator Burns: I was shocked and disappointed to learn that you had recently questioned the value of wilderness. In a December 2 Senate Oversight Hearing in Missoula, you stated that “wilderness limits the ability of folks to enjoy” public lands. You also questioned whether wilderness and motor free areas were “consistent with the multiple use” mandate of the U.S. Forest Service.

As a long time resident of Montana, and a staunch advocate for the preservation of Montana’s wilderness, I am writing today to tell you that Wilderness designations for many of Montana’s wild lands, is the only way to preserve the many wonderful places that Montana offers for hunting, fishing, solitude and open space. Wilderness represents Montana’s future, as well as its past.

Currently, Montana has less than 4 percent of its land protected as wilderness. All of our neighboring western states enjoy a higher percentage of wilderness designation. We already have 30,000 miles of roads in our national forests. We need to do more, now, to protect our remaining open spaces from excessive ORV use. Irresponsible ORV use leads to the spread of noxious weeds, habitat loss and the opportunity to hike on a quiet mountain trail.

Montanans need you to provide the leadership to maintain and preserve our wilderness heritage. Please do so.

PREPARED STATEMENT OF LEN AND NANCY LABUFF, MISSOULA, MT

Senator Burns: I am very disappointed concerning your comments on wilderness on Dec. 2 at a Senate Oversight Hearing in Missoula. Our wilderness areas in Montana are one of our greatest treasures we have. To allow road building, motorized vehicles, or logging in the areas would be an inestimable loss for all Montanans and U.S. citizens. Please work to protect these last wild areas we have in Montana. They are for everyone to enjoy and protect now and for future generations.

Thank you.

PREPARED STATEMENT OF RICH AND JEANNIE PRODGERS, DILLON, MT

Dear Senator: I strongly disagree with your statement that formal wilderness designation limits the ability of folks to enjoy public lands. Those are the lands my wife and I most enjoy. It’s that simple.

I recall recently reading your statement that logging forests is like cropping corn in Iowa. You’re right: it takes federal subsidies and is unsustainable in the long run.

Here in southwest Montana we had USFS roads out the wazoo, but Congress won’t appropriate enough funds to maintain them. Despite near-record elk numbers, the harvest was once again poor because they vacate the roaded areas in favor of more secure ones. More roads will mean less secure habitat and fewer elk, but not better hunting.

Chief in our desires when we go hiking is getting away from vehicles. We hike, fish, and hunt in wilderness areas and urge your support for additional wilderness designation. The future of Montana, as Bozeman as shown, lies in the beauty of our public lands, and only wilderness designation maintains their integrity.

Thanks for considering our views.

PREPARED STATEMENT OF EMILY LUNDBERG, BOZEMAN, MT

Senator Burns: In regard to U.S. Forest Service planning, wilderness and motor free areas ARE definitely consistent with the multiple use mandate. Polls show that the majority of Montanans want motor free areas to be preserved for quiet recreation and wildlife protection. In regions that are roaded, quiet use is eliminated from possibility. Although motorized access is reasonable in selected areas, there must also be large motor free areas preserved for the future. The children of Montanans must have the opportunity to hunt, fish, hike, etc. in Montana wilderness. Montana needs to preserve more wilderness, not less. This also supports the significant tourism industry in Montana.

Please view these issues with a long-term vision and step up to speak for the majority of individual Montanans. Future generations could build more roads if they wish, but they could never re-create wilderness.

PREPARED STATEMENT OF DON HARRIS, CLANCY, MT

Senator Burns: This is just a quick note to advise you that I am fully in support of protecting Montana wilderness for current use and for future generations. In my experience, wilderness is multiple use that excludes very few. In reality, we have very little wilderness in Montana and there is no way "to make more." Please protect or work to expand our current wilderness in Montana. This is the best decision in regard to long term planning and is also most supported by public opinion.

PREPARED STATEMENT OF REBECCA DURHAM, WHITEFISH, MT

Senator Burns: I am troubled by your quote, "wilderness limits the ability of folks to enjoy" public lands by keeping out off-road vehicle traffic.

As a Montana resident, I feel that wilderness and a healthy environment are extremely important. As our valleys fill with roads and traffic, wilderness, solitude, quiet, and the splendor of nature are extremely important. We owe it to ourselves and to future Montana generations to safeguard wild places. Please do not underestimate the importance of wilderness.

There are many places that people who wish to use off road vehicles may—in fact there are over 30,000 miles of roads in Montana national forests. Designating wilderness hardly limits the opportunities for this sort of recreation. Off road vehicle use is extremely destructive to the land when not properly managed, bringing in noxious weeds, pollution, and harming plants and animals. I urge you to support the National Association of Counties' call for the Forest Service to expedite forest travel plans that will establish responsible limits on ORV use.

Wilderness IS multiple use, and belongs in our forests along with suitable areas for logging and vehicle traffic. Senator Burns, consider that many of your constituents value wilderness, and please support wilderness designations.

PREPARED STATEMENT OF BRIAN PECK, COLUMBIA FALLS, MT

Senator Burns: What are you folks smokin' back in D.C. these days?! Of course Wilderness is one of the intended "multiple uses." I've lived in the Rockies and Montana for 35 years, and Wilderness is where I find the cleanest air and water, the biggest trout and elk, and some of the last of the Quiet on God's green earth. We've got something like 30,000 miles of roads on public land already and only about 4 percent of the state's in Wilderness. The guys who have forgotten the Montana traditions of hiking, horse packing, and floating, and can't go anywhere without their motors need to stop whining—they've got plenty of roads.

You need to get outta Washington Conrad, and back to the REAL Montana—it's Wild—not a bunch more roads filled with sissys who forgot how to pull on boots and walk, or ride a horse.

PREPARED STATEMENT OF ELON GILBERT, ARLEE, MT

Dear Senator Burns: As a resident of Arlee on the Flathead Reservation I have long been enjoying the wild areas that surround me as a hiker and skier. I have also been a participant in the forest planning (FP) activities in the last several months both here in MT as well as in ID. Two comments:

1. Despite lots of disagreement, FP is bringing folks together that thought they had nothing in common—this is healthy and the process should be respected, not usurped by political or bureaucratic behind the scenes dealings. The discussions on the roadless areas are the same ones that have featured in the FP process and this continues to cause confusion. I hope that you will see how the results of these two processes can converge.

2. I strongly favor keeping existing roadless areas as they are and support wilderness designation for special areas, including the Great Burn/Malard Larkin the LoLo and Clearwater NFs.

Thank you.

PREPARED STATEMENT OF JANELLE KUECHLE, MISSOULA, MT

Senator Conrad Burns: I attended the hearing you held on December 2, at the University of Montana, College of Technology in Missoula. After testimony from the six people on the panel, I heard you say to almost 500 people that you didn't "think it's any different than a field of Iowa corn or a grass field in eastern Montana." Re-

spectfully, Senator Burns, I couldn't disagree with you more. Having grown up in a farming community in Minnesota, a forest isn't anything like a corn field except that it is outside and grows. I realize that you probably made this comment off-the-cuff, but it seemed to show a lack of knowledge in regards to the reforestation projects that have run amuck. Because of clear-cut slopes which cannot support new seedlings due to slides and run off, not to mention a multitude of other reasons, so-called sustainable harvest has not hit the mark.

But, there's more to this issue. When we talk about multiple uses, it sounds like we all can use the forest together in harmony. In reality, uses don't always mix. For example, the Lolo Pass on the Idaho border has combined uses with separate trails for cross-country skiing and for snowmobiling. When I go up there to ski, I know that it won't be entirely peaceful, but I can live with that because I love the area. I have, however, yet to be up there when there hasn't been a snowmobile on the cross-country trail, or at least the results of one cutting across trails making it nearly impossible to ski safely.

There was testimony by Russ Ehnes, President of the Montana Trail Riders Association, regarding limiting public access. Conspicuous by its absence was that he didn't mention illegally made trails all over the State of Montana. Ehnes also stated that "the people who promote more wilderness are changing the nomenclature of the debate." Senator Burns, the words "wilderness light" are not coming from people who want wilderness designations. We want no such "wilderness light." We want some places designated as wilderness forever, so that they are free of machines forever. I do not believe that the wilderness designation undercuts local economies. In fact, we had 10 million visitors last year, many of whom were wilderness seekers. Besides, there are already 90,000 miles of roads in our State. That is more than the lion's share of Montana to be used by thousands of trail-vehicle riders.

Regarding the cutting of timber spoiled by the draught and subsequent beetle infestation, I believe that some logging should be allowed. However, not every piece of wood in the forest should be removed just because nature takes the course of fire and beetle kill. The trees that survive are the stronger strains which should be allowed to reforest the area. In addition, the remaining habitat provides cover for wildlife that is more conducive to the health of many species than a clear cut could ever be.

Senator Burns, please bring people together to plan ahead for multiple use that designates wilderness forever, areas for logging, and roads for vehicle use. And please don't let people just talk about the market economy. Let's talk about the "economy" of the spirit, which ultimately has great value for stressed human beings who are over-taxed by a world that is almost completely industrialized.

PREPARED STATEMENT OF TIM D. PETERSON, MISSOULA, MT

Senator Conrad Burns: I am writing to provide testimony on behalf of Wildlands CPR regarding the recent Congressional field hearing on Forest Planning held in Missoula. Wildlands CPR is a national conservation group that specifically targets off-road vehicle abuse on public lands and actively promotes wildland restoration, road removal, the prevention of new road construction, and limits on motorized recreation. Please include these comments in the formal hearing record.

Wildlands CPR would like to express concerns with the testimony delivered during the panel. Chief among our concerns are issues related to NFMA and NEPA, impacts related to dispersed motorized recreation, adequate funding to implement the new off road vehicle rule, wilderness recommendations in forest planning, issues related to forest health including beetle kill and logging, and concerns related to Forest Plan revision.

There seemed to be a presupposition by members of the panel that there is a lack of motorized recreation opportunities on our National Forests. This is not the case. According to Forest Service data, 36 percent of the national system, or 69,004,231 acres, is currently open to off-road cross-country travel. In addition, more than 273,529 miles of roads and trails are open to use by off road vehicles. These data do not demonstrate a lack of motorized access to America's National Forests. This abundant access the lack of balance on the ground, in fact, because only approximately 10 percent of national forest recreational visitors participate in winter or summer off-road vehicle recreation while at least one-third of the land is opened to cross-country travel, not counting the additional routes that are specifically designated for off-road vehicle use.

Dispersal of motorized recreation is also a concern for us at Wildlands CPR. Impacts from motorized users should be concentrated to reduce negative impacts to soil, water, and habitat, not spread over large and unmanageable areas. Russ Ehnes

of the Montana Trail Riders Association remarked at the hearing, in reference to off road vehicle use, that: "the solution to pollution is dilution." This familiar axiom was formulated in the late-twentieth century in relation to air and water pollution. The phrase implies that the same emission rate from a tall stack will have far less impact on nearby residents than a low stack. Unfortunately, this approach to lowering human exposure ignored the potential impacts of those emissions on areas further downwind. Hence the quick and easy solution, while effective, produced unforeseen environmental impacts. The same model is true in relation to impacts of motorized recreation. If more areas and trails are provided for motorized use, more negative environmental impacts will occur. This is especially true with regard to noxious and invasive weed seeds, which hitch a ride on motorized equipment. Forest Service Chief Bosworth named noxious and invasive weeds as one of the four key threats to the National Forest System. The more dispersed off road vehicles and motor vehicles become, the more dispersed noxious and invasive weeds become. A larger network of motorized routes also leads to greater habitat fragmentation and disturbance of wildlife and natural quiet. Instead of increasing impacts by permitting an ever-expanding network of motorized routes, negative environmental impacts should be avoided by restricting motorized use to areas and zones where it can be more effectively managed. It is also important to consider the multiple use mandate when planning for off road vehicle use. Multiple use does not mean every use in every area, but a balanced spectrum of conservation, recreation and extractive activities. Multiple uses of the forest include quiet recreation such as hiking, bird and wildlife watching and skiing. As off road vehicle use becomes more and more pervasive, many other multiple uses of forest land are displaced as quiet users abandon areas dominated by off road vehicles and their attendant noise, dust and pollution. Quiet places are becoming harder and harder to find on forest lands as off road vehicle technology improves and allows these vehicles to travel farther and farther into the backcountry, impacting more and more resources along the way. Effective application of the Forest Service's multiple use mandate must include room for the natural quiet and solitude nonmotorized areas provide.

Effective implementation of the new Forest Service rule "Travel Management; Designated Routes and Areas for Motor Vehicle Use" depends on adequate funding from Congress. When directly asked about funding needs, Chief Bosworth explained that the agency would find funding for route designations by being creative with line items rather than requesting additional appropriations. Here in Montana, we've already had one forest, the Helena, drop their travel planning entirely due to lack of funding. It is critical that Congress dedicate funding for route designation processes if the agencies are to deal effectively with off road vehicles. Adequate funding is crucial to correcting what the Chief named as another of the four key threats to the National Forest system, "unmanaged recreation." If not adequately funded, the new rule could flounder, leading to a continuation of the serious problems caused by unmanaged motorized recreation. We respectfully request that you take the initiative to fully fund the implementation of the Travel Management; Designated Routes and Areas for Motor Vehicle Use Rule.

The state of Montana currently contains 3,372,503 acres of designated Forest Service wilderness. Montana's total acreage is 93,153,280. Only about 3.7 percent of Montana is Forest Service Wilderness. Montana has a lower percentage of land area in designated wilderness than Idaho, Wyoming, Colorado, Washington, Nevada, Hawaii, Florida, Arizona, Alaska and California. No new Forest Service wilderness has been designated in Montana since 1983. Interest in quiet recreation has increased exponentially since that time, (at an even faster rate than interest in motorized recreation), and Montanans want more wilderness. In Forest Plan revision, planners are charged with the duty to make a recommendation to the regional forester for lands suitable, available and capable for wilderness designation. While this technical process is not a mandatory precursor to an actual designation by Congress, it is important to recommend that land be managed for non-impairment of wilderness values in the forest planning process. At the hearing, panelists argued that too much land is being recommended for wilderness designation in the forest planning process. The Beaverhead-Deerlodge was cited as a specific example. At 3.32 million acres, the Beaverhead-Deerlodge National Forest currently contains 225,147 acres of designated wilderness. This represents 6 percent of the forest. The recommendation under the preferred alternative for 246,500 acres, if actually congressionally designated, would bring the total to only 14 percent of the forest. This was highlighted as unreasonably large amount. We believe it is an unreasonably small amount. While wilderness recommendations such as these will be made for some forests, the Kootenai National Forest Plan revision contains no wilderness recommendation at all. This does not represent the Forest Service's multiple use mandate, as wilderness is a valid multiple use of federal lands. In addition, a common

complaint is that wilderness eliminates access. This is untrue, as there are many more ways to access the forest than sitting astride an off road vehicle. Wilderness does not disallow access; it only places restrictions on modes and methods of access.

Two of our nation's bedrock environmental laws, the National Forest Management Act (NFMA) and the National Environmental Policy Act (NEPA) were both referenced in the hearing. A need to reform these laws was expressed with the implication that these laws are outdated, written for a time when resource extraction was the management emphasis on public lands. Panelists argued that we have entered an era of restoration, and those laws (NFMA and NEPA) that once hindered resource extraction are hindering restoration. Unfortunately, we believe this is a misrepresentation of the actual on-the-ground situation. In recent years, land management planners have simply substituted the words "restoration project" for the words "timber sale" in project documents. Given this mostly semantic change, many projects are challenged by conservation interests and citizens on the basis that they are not, in fact, true restoration. If these projects were indeed true restoration, they would meet far fewer challenges from the conservation community. Another common semantic smokescreen packages logging related to fuels reduction and reduction of fire risk as restoration. These projects may benefit local communities in terms of reducing fire risk, but they are seldom truly restoration. Land managers must consider the mandate of the NFMA—its requirements have improved management, monitoring and accountability. Public involvement, adequate consideration of environmental impacts, and the open processes guaranteed by NEPA are critical to the function of a public land agency. This success is not an indication that these bedrock laws need reform. If restoration is the true goal, forest projects should be defensible and thus move quickly through the NEPA process. These key laws hold land managers accountable to the American public, conservation and industry interests alike.

The panelists' discussion surrounding beetle killed trees demonstrated a fundamental lack of understanding of natural processes of forest health, as well as the scope and scale of forested federal land. It is simply not practical or advisable to remove every single beetle-killed tree from federal land. Leaving dead and down trees in the landscape is not "a waste of timber," it allows completion of the nutrient cycle. Some species, such as lodgepole pine, evolved with beetle kill and the fire that often follows for healthy regeneration. It is not possible to mimic natural processes by simply building roads and cutting trees. To do so would remove a substantial portion of the nutrient cycle, as well as further disturb other terrestrial and aquatic habitats. While factors such as global climate change, drought, and the effects of a century of fire suppression are leading to increased beetle kill in some areas, "outbreaks" on a landscape scale before Anglo settlement have been recorded all across the west, including the Flat Tops of the White River and Routt National Forests in Colorado and the high plateaus of the Manti-LaSal, Fishlake and Dixie National Forests of central and southern Utah. It is simply not possible to keep ahead of beetle kill by cutting trees. Contrary to Chief Bosworth's assertions, there is simply no sound science indicating that such a scenario would be plausible or beneficial to forest health. Chief Bosworth explained that land use designations will occur at the forest planning level. The agency must be clear about its multiple use mandate in forest planning, taking great care to be sure to include lands suitable for wilderness and lands suitable for other nonmotorized recreation, as well as supplying forage, wood and water.

Finally, you remarked near the end of the hearing: "I don't think [national forests are] any different than a field of Iowa corn or a grass field in eastern Montana." There is a vast difference between a piece of private ground managed for a single use and America's public lands. National Forests are not tree plantations, and more than just commodity harvest must be considered in their management. National forests are managed for multiple use, not single-use commodity production. The philosophy of National Forest as national woodlot is not one shared by the majority of American citizens, who see National Forests as a prime source of recreation, clean water, wildlife habitat, solitude and stunning natural beauty.

PREPARED STATEMENT OF SHARON DILL, FLORENCE, MT

I was out of town when your hearing was held in Missoula on Dec. 2. I would like my comments added to those of others.

I attended several of the FS planning meetings and felt that they were bending over backwards to give the public a chance to be heard. If anything, there were so many meetings that it was hard to pick and choose which were most important to attend.

You seem to have a concern about the multiple use mandate to the FS. To me, multiple use means that all types of use are worked into the forest plan, but it does NOT mean all at the same place. For example, I was recently cross country skiing at Lolo Pass. I dreaded crossing the road which the snowmobilers are allowed to use. Why? Because it is dangerous! I have heard that they are supposed to have a speed limit of 15 mph in that area, but that simply doesn't happen. It hasn't been that long ago since a skier was hit and killed by a snowmobile in that same area so my concerns are legitimate.

Please work to bring people with different interests together to figure out which areas work best for which activities and alleviate the polarization that tends to happen.

I support wilderness areas and would like to see them increased. To me, that is the most important of the "multiple uses."

I realize today is the deadline for submitting comments and hope this is not too late. I was unable to get online earlier due to technical problems with the internet connection.

Thank you.

PREPARED STATEMENT OF JANE TIMMERMAN, KALISPELL, MT

Sir: I moved to Montana 16 years ago looking for wilderness, wild animals, open spaces, peace and quiet that I couldn't find in the Midwest anymore. Now, north-west Montana is being "discovered" and open spaces here are dotted with ranchettes, strip malls. Even more, we need to preserve our wilderness (now only 4 percent of our state) because people need it to get away, for that peace and quiet. I'm not that good with words or describing my feelings, but I know how important a move Montana was for me. Please don't allow our wilderness to go to the highest bidder (big companies/corporations) who'll impose more limits in access to our state treasures of open and wild lands.

Thanks.

PREPARED STATEMENT OF GLORIA FLORA, HELENA, MT

Greetings Sen. Burns: You invited comment essentially asking the question, "What good is wilderness?". A good question: one that begs an answer that is both simple yet profound.

Less than 5 percent of our state is wilderness, that means our great-grandchildren can expect that less than 5 percent of the state will be almost exactly as it was in our ancestor's time. (Do you recall the extent to which your hometown and its surroundings have changed?) But instead of counting wilderness acres as a percentage of the state, we should count wilderness acres per capita . . . they're going down every year as the population grows. And this isn't just a Montana resource, these lands belong to all Americans, we're just the temporary caretakers—and typically darn good ones.

Wilderness is a living, interactive museum as well as our childrens' legacy. Wilderness is an incredible source of clean water, trees that provide oxygen and absorb carbon dioxide, unaltered vistas, a laboratory for research, a multitude of recreation opportunities, especially hunting and fishing, a unique state identity drawing millions of tourists, a well-spring of biodiversity . . . the list could go on and on.

Over 100 prominent scientists had this to say about undeveloped landscapes. "Undisturbed forests are less susceptible to tree diseases, insect attacks, and invasions from non-native species, and are less likely to have suffered the adverse effects of fire suppression. These healthier ecosystems are in turn more able to withstand the effects of global climate change and act as refugia for sensitive wildlife and plant species, many of which are vulnerable to extirpation in more developed areas. Thus, intact forests can serve as reservoirs as surrounding landscapes become genetically impoverished."

As I said when asked the same question on a PBS TV show, "Wilderness represents the land as it was, and as it can be, and will be into the future. And it provides us not only the understanding of an undisturbed eco-system, but it also provides a beautiful opportunity for people to reconnect with nature. And that is a fast disappearing commodity in the world."

The wealthiest country in the world surely can afford to treat its resources sustainably. The Creator didn't just generate a marvelous, fecund landscape so every acre could be used up or destroyed. A prudent farmer keeps some of the seed stock.

There are volumes of books devoted to the subject, if you'd like some recommendations, let me know. You may also want to spend some time at the renowned Arther Carhart National Wilderness Training Center in Missoula, Montana.

Thanks for asking.

PREPARED STATEMENT OF DEBBIE MILBURN, HELENA, MT

Why do Americans need more wilderness? Because it provides something that is in very short supply in our modern life:

- Quiet
- Slower pace of life
- Pollution-free air, water and soil

It's as simple as that. Off-road vehicles (OHVs) threaten these precious attributes. People don't need OHVs to recreate on public lands—they are not a traditional use. Our National Forests, along with Parks, Monuments and BLM lands are our last refuges from motor vehicles that are so prevalent in every other aspect of life. Wilderness and de facto wilderness is multiple use and a good choice for our land managers. Don't complicate the issue by allowing OHVs. There will be less:

- trail maintenance,
- user conflicts, and
- impact on natural resources

Our last remaining natural places should not be spoiled by allowing OHV use.

PREPARED STATEMENT OF ROCKWOOD SCOTT BROWN, BILLINGS, MT

Senator Burns: I am the owner of two outdoor stores—The Base Camp in Billings and Helena. I am writing to urge you to support Montana's Wilderness. Our Wilderness areas are very important to me, my business and all of our staff. Wilderness promotes the use of the goods we sell. Thanks for your consideration.

PREPARED STATEMENT OF DR. BRUCE AMMONS, ARLEE, MT

I am very upset over the lack of protection for wilderness and wild areas within the purview of the Forest Service.

I have lived in Montana my entire 50 years and started going to the Bob, Glacier, Yellowstone, and dozens of smaller parks when I was 4 years old with my father, carrying a tiny Kelty frame pack and enjoying the grandeur of the land and close contact with other animals.

As a long-time citizen of the state, well-travelled over the United States and to other countries, I urge you to do the right thing for our children and create as much wilderness as is possible at this point—which actually can't amount to much overall even at a maximum, due to encroachment.

I have seen populations of animals dwindle, forest roads lead poachers and trespassers on noisy, damaging ATVs into my family's land up Deep Creek, and snowmobilers trespass on all sorts of wild places they are not supposed to be so that they may "high mark". (Unfortunately, these idiots don't kill themselves often enough to really effectively remove themselves from the gene pool . . .) I have nothing against ATVs—they are very helpful on my farm.

We owe it to common sense, decency, our children and theirs, other critters, and to peace-and-quiet, nature loving humans from all over to create wilderness, limit roads, create eco-corridors, ban ATVs from wild lands, and to not simply follow the nods of the lobbyists with money and power. Don't the ads on TV with Hondas and Kawasaki's tearing trails through wild desert and mountains bother you? The Japanese corporate bosses encouraging Americans to destroy their own heritage while lining Japanese pockets? They certainly bother me. Chevy ads where the desert dunes and wild areas are trashed in some display of macho are equally bothersome . . . These ads appeal to people who have never taken the time to learn how to be "with" the land and truly enjoy it. One doesn't "conquer" nature.

If you want to see what happens in a state that really loves its ATVs and does little to control them, go look at southern Utah—huge, washed gullies from trails all over previously pristine wild areas. I have been bucked off horses frightened by snowmobiles and ATVs. let them use the 90,000 miles of roads that are already present in Montana and keep them off our wild trails.

Recent plans for our national forests are appalling. They seem to have only one thing in mind: more areas to shred and make money from, votes to be had from the motorized folks, all at the expense of those on foot who do no damage to this

beautiful heritage. Do not allow development that tears up the land and THEN asks for forgiveness, such as the BS development of a bogus ski area on Lolo Peak south of Missoula. This is not good land stewardship, not smart business thinking, and not what the majority of Missoulians want. The fellow who is behind it has a track record of dumb business deals and ego-maniacal thinking. I knew the previous generation of the Maclay family and I think they'd have given him a spanking for his rotten behavior.

PREPARED STATEMENT OF THE GREATER YELLOWSTONE COALITION

Senator Burns and Committee Members: Please accept these comments from Greater Yellowstone Coalition (GYC). GYC is a non-profit, conservation organization with offices in Bozeman, Montana; Cody and Jackson, Wyoming; and Idaho Falls, Idaho. Our membership of approximately 12,600 individuals, 100 local, regional, and national conservation organizations and 120 business sponsors, is committed to protecting and preserving the lands, water, and wildlife of the Greater Yellowstone Ecosystem, now and for future generations.

GYC works on public land management issues throughout Montana, Wyoming and Idaho. Our work in Region 1 of the Forest Service focuses on the Custer, Gallatin and Beaverhead-Deerlodge National Forests. Our comments reflect our experiences working with local citizens and local land managers on Custer, Gallatin and Beaverhead-Deerlodge National Forest issues.

FOREST PLAN REVISIONS

Forest plans and other land management projects are created in the broader public interest through a robust process of public participation. As Region 1 National Forests have undertaken the task of revising their forest and travel plans, the Forest Service has met with local citizens, held open house meetings in communities and listened to citizens who are most effected by land management decisions. Many Montanans have participated in these processes, working together and with the Forest Service to develop workable plans that reflect balance and multiple use management. Montanans are looking to Senator Burns for leadership in supporting these local efforts and the workable solutions developed through extensive public involvement. We offer two examples, from our own recent experience.

The Gallatin National Forest is in the process of revising its travel management plan that will determine where and how people use the forest's roads and trails for the next 15 to 20 years. In September 2005, the Forest Service concluded its public comment period for the Draft Environmental Impact Statement (DEIS) for the travel plan.

The Gallatin National Forest has done an excellent job of involving local communities and recreational users of the forest throughout its travel planning process. GYC disagrees with some of the specifics in the Gallatin National Forest's management proposal. We believe the preferred alternative does not do enough to protect the forest's wildlife habitat, water quality and quiet recreation opportunities. Nevertheless, we support the process used by the Forest Service during travel planning. Our members, along with many others, actively participated in the development of a travel plan for the Gallatin National Forest.

Thus far, the Gallatin National Forest has spent over 3 years revising its travel plan.¹ The initial scoping process began in August 2002, with open houses in local communities and a 90-day public comment period on the scoping document or the "benchmark."²

The Forest Service then released a description of alternatives for public review in August 2003, with another round of open house meetings in local communities and gave the public 90 days to comment on its proposal. On February 14, 2005 the Forest Service released its DEIS. The Forest Service held open house meetings in local communities near the Gallatin National Forest including: Bozeman, Big Sky, West Yellowstone, Big Timber, Billings, Cooke City, Gardiner and Livingston. These open houses gave local people an opportunity to meet with the Forest Service and provide the Forest Service with comments and ideas.

Initially, the Forest Service gave the public a 90-day comment period to comment on the DEIS. During this comment period it became obvious that the public needed more time, and the Forest Service extended the comment period for an additional 45 days. When a computer glitch impacted peoples' ability to comment, the Forest

¹ http://www.fs.fed.us/rl/gallatin/projects/travel_planning/pdf/timeline01_04.pdf

² http://www.fs.fed.us/rl/gallatin/projects/travel_planning/pdf/Travel_Briefing_Paper_March_2005.pdf

Service granted yet another comment deadline extension. The comment period on the DEIS closed on September 2, 2005, lasting over 200 days. No one can rightfully claim that the Forest Service did not give the public ample opportunity to be involved in the travel planning process.

Thus far the Forest Service has received over 16,000 comments on the Gallatin travel plan:

- 1,600 comments on the benchmark;
- 3,200 comments on the draft alternatives; and
- 12,000 comments on the draft environmental impact statement.

The Beaverhead-Deerlodge National Forest is also in the process of revising its forest plan.³ Since January 2002 when the Forest Service released its scoping document, the Forest Service has attended over 100 meetings with interest groups and public officials to discuss the forest plan. These meetings resulted in a draft forest plan and Draft Environmental Impact Statement (DEIS), released in June 2005.

Again, GYC supports the process the Forest Service used to engage the public in developing this revised forest plan. Like the Gallatin, an initial 90 day comment period was extended to ensure the public and all interested parties had adequate time to comment on the draft Beaverhead-Deerlodge Forest Plan. The Forest Service gave the public over 120 days to comment, and when the deadline closed on October 31, 2005 the Forest Service had received over 9,600 comments.

MULTIPLE USE AND WILDERNESS

The Forest Service is mandated to conduct forest plan and travel management plan revisions following a number of federal laws and regulations, including the Multiple-Use Sustained-Yield Act of 1960 (Act). The Act states, “that the national forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes.”

The Forest Service recognizes a number of activities classified as outdoor recreation including: hiking, hunting, bird and wildlife watching, wilderness, motorcycle and OHV use, skiing, snowshoeing, snowmobiling, etc. Under the Act, the Forest Service is mandated to provide a variety of outdoor recreational opportunities to the American people. However, this does not mean the Forest Service has to provide all types of activity on all areas of national forest lands.

Under the Multiple-Use Sustained Yield Act wilderness, wilderness study areas and recommended wilderness are recognized and considered part of the multiple use spectrum. The Act specifically recognizes wilderness as multiple use: Section 2 [16 U.S.C. 529] states, “The establishment and maintenance of areas of wilderness are consistent with the purposes and provisions of this Act.”

The Act recognizes that multiple use of public lands does not mean all uses can occur in all places: Section 4 [16 U.S.C. 531] defines multiple use as:

(a) “Multiple use” means: The management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will *best meet the needs of the American people*; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that *some land will be used for less than all of the resources*; and harmonious and coordinated management of the various resources, each with the other, *without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output*,” (emphasis added).

The Forest Service continues to manage Region 1 forests under the Multiple-Use Sustained-Yield Act by providing the public with a full range of opportunities and by managing forest lands for wildlife, recreation, timber production, mining, watersheds and grazing.

Designated wilderness is a vital resource to Montanans and an appropriate use of national forest lands. Wilderness areas provide recreational opportunities unavailable anywhere else in the world. They also protect important fish and wildlife habitat and water quality.

Only about 18 percent of all national forest lands are designated wilderness. In Region 1, which includes Montana, Northern Idaho, North and South Dakota, there are 25 million acres of national forest lands, of which 5 million, or 20 percent, are designated wilderness. On the Beaverhead-Deerlodge there are two wilderness

³ <http://www.fs.fed.us/r1/b-d/forest-plan/revision/overview-status.htm>

areas, the Anaconda-Pintler (117,435 acres) and the Lee Metcalf (107,694 acres), totaling 225,147, or 7 percent of the 3.3 million acre forest.⁴

The Beaverhead-Deerlodge's preferred alternative for the forest plan proposes to designate additional wilderness. If all lands recommended for wilderness under the preferred alternative were managed as wilderness, only 14 percent of the forest would be wilderness.

The Gallatin National Forest encompasses 1.8 million acres of land and contains two wilderness areas—the Absaroka-Beartooth (575,771 acres) and the Lee Metcalf (140,594 acres).⁵ Approximately 39 percent of the forest is designated wilderness, leaving over 60 percent of the forest to be managed for other types of use.

The Custer National Forest encompasses about 1.3 million acres and contains approximately 345,599 acres of designated wilderness⁶ including the Absaroka-Beartooth. Designated wilderness comprises approximately 26 percent of the forest, leaving over 74 percent of the forest to be managed for other types of use.

In 2003 the Forest Service conducted a Wilderness Needs Assessment for Region 1 and found a need for additional wilderness⁷ for the following reasons: to provide for an expanding population, secure habitat for species that are dependent upon large undisturbed landscapes, and add underrepresented ecological cover types to the Wilderness system. Demand for wilderness recreation and experience is increasing. By managing areas as wilderness the Forest Service will provide wild places for people to visit and wildlife to thrive.

PROTECTING WILD LANDSCAPES MAKES ECONOMIC SENSE

Numerous economic analyses have shown that Montana's protected public lands provide us with a competitive advantage over other parts of the country. Montana's public lands help attract new businesses, helping our local economies grow and diversify, creating opportunity for young people in Montana. Our public lands contribute to the lifestyle that so many Montanans enjoy.

During the Gallatin National Forest travel plan revision the Forest Service conducted an expanded social economic analysis. Monitoring data showed that there were approximately 1.9 million visitors to the Gallatin in 2003. Using visitor expenditure information, it is estimated that these expenditures contributed about 1,100 jobs or 2 percent of the local economy.⁸

The analysis looked specifically at how different types of recreation contribute to our local economy and found non-motorized use produces \$5,605,337 in direct labor income effects and \$1,733,549 in indirect and induced labor income effects.

Montana's protected federal public lands provide us with a competitive advantage compared to other states or regions of the country. These national forest lands provide us with a longer hunting season, clean drinking water, opportunities for fishing and serve as an economic driver for our local economies. Managing these lands for their natural integrity allows Montana to keep our economic edge.

Natural resource issues have long been controversial in Montana. That controversy reflects the public's passion and love for the bountiful wildlife, clean water, abundant fisheries, and wild lands that are part of our heritage. GYC asks that you safeguard that heritage. Please ensure that the natural resources we cherish are managed thoughtfully, with a sustainable, long-term vision. We ask you to provide support and leadership to efforts in Region 1 where Montanans are reaching across diverse interests to find workable solutions, rather than continue to foster polarization.

We also ask you to let the Forest Service do its job. By working with local citizens to balance diverse and sometimes competing needs the Forest Service can meet public demand and ensure our national forests continue to provide high quality wildlife habitat, clean water and a variety of recreational opportunities.

Thank you for considering Greater Yellowstone Coalition's comments. Please feel free to contact me with any questions.

PREPARED STATEMENT OF FAMILIES FOR OUTDOOR RECREATION

Honorable Senators: Chairman Conrad Burns, Thad Cochran, Robert Byrd, Pete Domenici, Robert Bennett, Patrick Leahy, Ted Stevens, Herb Kohl, Byron Dorgan,

⁴ http://www.fs.fed.us/rl/b-d/forest-plan/drafts/deis-voll/ch-3h_inv-roadless-areas.pdf

⁵ http://www.fs.fed.us/rl/gallatin/projects/travel_planning/pdf/Deis_Ch_3/Ch3_Wilderness.pdf

⁶ <http://www.fs.fed.us/rl/custer/aboutus/index.shtml>

⁷ http://www.fs.fed.us/rl/b-d/forest-plan/drafts/deis-voll/ch-3h_inv-roadless-areas.pdf

⁸ http://www.fs.fed.us/rl/gallatin/projects/travel_planning/pdf/economic_social_Report.pdf

Dianne Feinstein, Judd Gregg, Larry Craig, Harry Reid, Barbara Mikulski, and Wayne Allard.

Senators: Families For Outdoor Recreation (FFOR) represents thousands of families and groups across Montana, Northern Wyoming, the Dakotas and Southern Idaho. For decades generations of families have accessed our United States Forest Service (USFS) public lands to recreate, hunt, attain their livelihoods, and utilize public lands under the "sustained multiple-use" designations these public lands were set aside for. We are very supportive and want to express our appreciation for your time, attention, and interest in holding this special hearing by the Senate Interior Subcommittee. Our comments contained within this testimony, while very direct and pointed, are submitted with the utmost respect for the people and authority of the USFS. We believe that this Senate Interior Subcommittee Special Hearing can be the start of a process where the membership of the Senate Interior Committee, USFS Chief Bosworth, and the USFS Northern Region Forester Gail Kimbell can together come to the realization of how far the USFS has moved in their policies and actions away from managing public lands for sustained multiple use toward single "quiet" wilderness-like use. Furthermore we hope that this special hearing fosters a realization of the significant erosion of trust, confidence, and observed competencies the public has in the USFS of Region 1. Finally, we hope this special hearing kicks off a process for the USFS to reverse decisions and policies in order to return the USFS to the role of stewarding and managing our public lands in a manner that meets the mandate of sustained multiple use where we are all able to enjoy our public lands in the appropriate manner as we traditionally have been able to while protecting our great treasures for future generations to enjoy.

Through the last five years the policies of the USFS in Region 1 have been undergoing continual land use management and planning transformations. There has been the "3-State OHV Rule", several forest plan revisions, the Clinton Roadless Area Conservation Rule, the Travel Planning Process which is currently underway and the Bush Roadless Petition Process to name a few. During the next five years we will likely see the completion of the Travel Planning Process, some level of implementation of the Bush Roadless Petition Process, and implementation of the recently released "Final OHV Rule". One of the fundamental rules of management is "make a good plan, implement the plan, monitor the outcome, and tweak things to perfect the product". The USFS seems to be constantly changing their mind, switching and mixing Plans, Planning Methods, Policies, and mandates up. They have yet to implement a plan fully and thoroughly that meets the mandate it was originally set out for before grabbing for another Planning process. With all of these rules, changes, and the constant state of flux within the policies and planning it should not come as any surprise to hear that the public is confused about the process or what is actually being done, disgusted with the outcome, and generally frustrated with as well as distrustful of the USFS. We certainly hope this is not the desired outcome but it appears that confusing the public may be part of the overall strategy of the USFS.

The 3-State OHV Rule is a mandate for the USFS to use in managing motorized use on public lands. If properly implemented this rule is a powerful tool for the USFS to use in managing motorized use and to address the claimed and perceived problems. Beyond applying the 3-State OHV Rule to inform the motorized users to "Stay on the Trail", the USFS has done a very poor job of adequately completing their responsible actions related their role in implementing this rule. Some trails were identified and some critical analysis was completed but not consistently across the Region. The public was minimally informed and educated but the rule has not been enforced in a consistent nor adequate manner by the USFS. Basically, the USFS applied the 3-State OHV Rule to bar the creation of new trails and freeze motorized use of public lands to the established trails and roads. It appears by their partial and incomplete implementation of the 3-State OHV Rule that the USFS may not really be interested in managing motorized use of public lands. Could it be that the USFS has a goal for motorized and mechanized activities on public land which is broader and more limiting than the 3-State OHV Rule will achieve? Could that goal be one of ultimately eliminating motorized and mechanized use from a majority and eventually all of Region 1 Forest Service public lands?

The forest plan revisions have been on-going over the years with continual dwindling of sustained-multiple-use to a single use by hiking or horseback only. We continue to see less and less management of timber, management to prevent insect infestation, management of fuel load for fire prevention, road management, and trail management by the USFS. Our forest plans are becoming more and more oriented toward "hands off" and "people out" also known as "managing toward de facto Wilderness". In addition, many of the Wilderness Study Areas that were designated many years ago to evaluate for the potential for Congress to designate them as Wil-

derness have been managed as de facto Wilderness ever since the studies started and well beyond the promised completion date with no timely resolution of the plan to return the areas to sustained multiple use or have Congress designate them as Wilderness. Motorized use has been banned, timber harvesting is off-limits, removal of undergrowth and dead timber for fuel control is not being proactively employed on most of these Wilderness Study Areas. Perhaps this “hands off” and “people out” forest planning approach should be interpreted by Congress as a signal that there is a diminished need for the USFS department at its current staffing levels within the United States Department of Agriculture and USFS budget cuts should be imminent.

Having seen the travel plans and the preferred alternatives for major reductions in motorized use across Region 1 it is obvious that the Travel Planning Process we are in the midst of now became a “golden opportunity” for the USFS to eliminate motorized and mechanized use from the current roadless areas, turn areas with trails and roads into roadless areas at their discretion, and further squeeze motorized and mechanized use off of the public lands. In eliminating motorized access from our public lands the USFS is preventing healthy individuals as well as the handicapped, elderly, and disabled people from being able to experience the beauty any distance from the main road across Region 1. While the final decisions are not yet made it appears to be unlikely that the travel planning on any forest in Region 1 will be completed without at least forty percent reductions in user access and possibly as high as eighty percent reductions in use and access for some forests. Where in the mandate for Travel Planning does it designate that ANY trails or areas must be closed or need to be considered for closure? Why not propose an increase of forty percent in trails and roads that would fit with the increased popularity of motorized recreation?

Public involvement in commenting on the plans is a process the USFS is going through to “touch base” in the run to implement the preferred closure alternatives. In more than one instance during the past year there were two or three of these travel plans issued for public comment at once. At the same time there has been BLM planning requiring public involvement and comment underway simultaneously. These same people that need to review and comment on the plans also have full time jobs providing a living for their family, keeping our economy productive, and paying their taxes. This all has made it impossible to achieve adequate public involvement in the travel planning process. Was making public comment difficult a part of the strategy of the USFS? We hope not but it appears to be the case. This travel planning process should have been completed over a period of years, should have been staged for effective public involvement and comment, and most importantly should have been issued first on an “as-is” basis period, with no closures of areas to motorized access in this initial phase of the travel planning process!

Trail identification and mapping is the foundation to the travel planning process. The trail inventories used for the travel planning should have been the same inventories used for the development of the 3-State OHV Rule. Unfortunately, the trail mapping, route inventory, and condition analysis from the 3-State OHV Rule was never completed adequately.

A vast majority of the Region 1 travel planning is invalid because of incomplete and ineffective trail identification, mapping, condition analysis, and marking. Finally, the maps presented in the travel plans lack enough clarity, resolution, and legend reference to distinguish what the plans really are for the trails.

The analysis shown in the travel plans rendered thousands and thousands of pages of documentation laden with opinions, selective science, and very little statistical or factual data relevant to Region 1. This is another significant indicator that the travel plans were completed in a hurry-up manner with a predisposed outcome to close areas and trails for motorized and mechanized. The economic analysis in the travel plans is general, high level and opinion-biased. It lacks professionalism, statistics, and surveys of affected people in the Region. The impact of motorized use on wildlife provided within the travel plan analyses was based upon opinion-bias not complete science. Wildlife studies that were cited were not taken in whole, entire sections were taken out of context to support decisions to close trails, roads, and large areas to snowmobiles based on motorized impact on wildlife. The scientific studies reveal that motorized use has a lower impact on wildlife than hiking and hunting. If it is truly the intent to not disturb wildlife then the areas need to be closed to all human use, not just motorized!

Instead of performing travel planning for existing trails and roads and identifying roadless areas the USFS has adopted a policy in their travel planning which has a clear intent to discriminately eliminate selected families and individuals from being able to utilize a vast majority of public lands based upon their chosen form

of sustained multiple use. The Wilderness Initiatives and Anti-Motorized Initiatives that can be seen on the web pages of the Wilderness advocate groups look strikingly similar to the content of the travel plans produced by the USFS. The management of the USFS is running rough-shod over the public and Congress in their quest to create de facto wilderness areas and to manage existing Wilderness Study Areas as de facto Wilderness. They are leveraging the travel planning mandate as the “golden opportunity” to aggressively achieve this agenda. Some at the USFS will cry foul to this accusation but the facts and the travel plans presented plainly display the de facto wilderness creation and management agenda. The plans and preferred alternatives presented by the USFS; ARE discriminating against motorized and mechanized use across large areas by locking gates and stripping roads and trails away from the public, eliminating snowmobile use from large tracts of public land, designating areas as “roadless” which actually have established roads and trails, NOT undertaking selective timber harvests to maintain a healthy forest, managing Wilderness Study Areas as de facto Wilderness, and the list goes on. As you investigate and analyze this situation you will come to the conclusion that the USFS is not adhering to their mandates of “public service” and “sustained multiple use”. Furthermore, I believe you will agree that the creation of de facto Wilderness Areas and management of Wilderness Study Areas as de facto Wilderness is a slap in the face of our Congress.

In June of 2005 the USDA released the most recent OHV Final Report. One key learning from the report is that twenty-five percent of the people prefer to participate in motorized recreation on public land. In Montana the number is slightly higher, nearing thirty percent of the population that desire motorized recreation on public land. The number of people recreating on public land using motorized has increased by eighty-six percent between 1994 and 2004. The USFS has seen the numbers of families and individuals choosing motorized travel on public land as a preferred form of recreation trending upward for many years yet they have not directed their resources to management of this use of public lands. If there is a problem with OHV use on public land then the USFS is a part of the problem by not actively being involved in monitoring the use, educating the public, and enforcing the rules. Following the trend of this report one with common sense and logic would expect the travel planning preferred alternatives to be those that present a larger number of motorized use, access and recreation opportunities. Instead the USFS management approach taken consistently across Region 1 is that of proposing severe restrictions and banning families from motorized use of our public lands. This approach reflects that the attitude of the USFS has become one of—motorized and mechanized use is bad for the land and wildlife and therefore must be banished from the lands managed by the USFS.

Families For Outdoor Recreation appreciates the time, energy, and interest of this Subcommittee and we feel through your oversight you will recognize and force the USFS to address their unfair, discriminatory and questionable practices, policies, and initiatives in public land management. Furthermore your actions are timely and necessary to intervene on behalf of the public to put a halt to the planned management actions of the USFS which will result in closures of significant portions of our public lands, barring future public use. The closures proposed for our public lands will forever reduce the ability for families, the handicapped, the disabled, and individuals’ freedom to access significant areas of our public lands for recreation and to enjoy the awesome beauty. There is no reason to hastily rush through this travel planning process and do a sloppy job we will all regret and the USFS will face litigation over for a generations to come. Families For Outdoor Recreation requests the Subcommittee take the following items forward to the Committee for action:

- Place an immediate moratorium on all Region 1 travel restrictions and closures.
- Require the Forest Service complete the trail inventory and condition analysis of current travel routes as was required by the 3-State OHV Rule AND properly implement and enforce the Rule.
- Require the Forest Service utilize NEPA if they choose to permanently close trails on a trail-by-trail basis.
- Require the Forest Service complete an economic impact analysis with surveys of statistical relevance for the areas where they are planning trail or area closures to motorized use.
- Require the Forest Service to be held to the same high standard which the government holds private citizens and companies to for the use of statistical and scientific data in the analyses performed for NEPA or otherwise in the forest planning activities.
- Require the Forest Service to stop discriminating against American citizens with physical handicaps, elderly, and disabled veterans and their families through their closures to motorized access and use on public lands.

- Require the Forest Service implement proactive timber harvesting and fuel load reduction management practices.
- Require the Forest Service to stop managing the public lands toward turning them into de facto Wilderness and to stop managing current Wilderness Study Areas as de facto Wilderness.

Families For Outdoor Recreation and our membership would like to express our sincere appreciation and support to you for conducting this Senate Subcommittee field hearing here in Missoula Montana. Our mutual desire is to keep our beautiful public land and wildlife treasures healthy, flourishing, well cared for and available for all to see and enjoy.

PREPARED STATEMENT OF THE BLUE RIBBON COALITION

The BlueRibbon Coalition is a nationwide organization representing 600,000 motorized recreationists, equestrians, and resource users. We work with land managers to provide recreation opportunities, preserve resources, and promote cooperation with other public land users. Following are our comments on the Draft Beaverhead-Deerlodge Forest Plan Revision (Revised Plan).

We have many members in Montana and Idaho who recreate on the Beaverhead-Deerlodge. They are gravely concerned about preferred alternative 5 and the Revised Plan's direction. The Revised Plan would create six new recommended wilderness areas and add to two existing areas for an increase of 70 percent. Furthermore, it intends to manage these areas as if they had already been designated by Congress. It would close 158 miles of road and 234 miles of motorized trail, most of those in the most scenic areas of the forest. Summer motorized recreation opportunities would be reduced from 71 percent of the forest to 54 percent and snowmobiling would be reduced from 84 percent of the forest to 63 percent.

Detailed comments on these issues in the entire Revised Plan have been submitted by our members and member organizations in Montana. We would like to specifically acknowledge and incorporate by reference the comments of Capital Trail Vehicle Association, Montana Trail Vehicle Riders Association, and Montanans for Multiple Use. We also wish to incorporate by reference the comments of the Idaho State Snowmobile Association. We are limiting our comments to the Draft Environmental Impact Statement (DEIS) and Revised Plan's direction for the Centennial Recommended Wilderness Management Area (Mt. Jefferson area).

We find the DEIS' analysis of the Mt. Jefferson area significantly flawed, and are opposed to the selection of Alternative 5 which would eliminate snowmobiling in the area. Throughout the analysis, the DEIS fails to acknowledge that Mt. Jefferson area snowmobiling is nationally famous for outstanding scenery, challenge, and diverse appeal and where this enjoyment has no lasting impact on the resource. The Revised Plan usurps Congress' power to designate Wilderness by imposing Wilderness management administratively.

FLAWS IN DEIS ANALYSIS

Demand for Wilderness. The DEIS carries forward in its analysis the assumptions taken from FSH 1901.12 that the demand for wilderness increases with both an increasing population and awareness of wilderness. Yet specific National Visitor Use Monitoring (NVUM) data shows that wilderness visits in the Beaverhead-Deerlodge are only 1.2 percent of the total visits. Clearly, there is no demonstrated need if the use data is factored in, as it should be. Conversely, the DEIS acknowledges the demand for lands available for diverse recreation not allowed in wilderness. By recommending more wilderness and managing it as if it were already designated, these high quality lands are removed from the diverse recreation base where demand is increasing. By doing so, the Revised Plan ventures beyond resource protection and makes the political decision to "protect" high quality roadless areas from diverse use, even though few may actually visit.

The DEIS incorrectly includes the subjective value, "solitude" in its Wilderness Suitability Evaluation. Solitude is one of the attributes of wilderness guaranteed in the Wilderness Act, and is not necessarily a condition present in lands suitable for eventual designation by Congress. It therefore does not need to be present, nor guaranteed in the present, only if designation occurs in the future. For example, lands now under consideration by Congress for wilderness have significant human incursions and less solitude, specifically acreages identified in the Wild Sky Wilderness bill in Washington State. The DEIS confuses managing the present condition with managing future designated wilderness.

The DEIS addresses manageability in its Wilderness Suitability Evaluation, two components of which are presence or absence of non-conforming uses, and size and

shape for effective management. Clearly these two components have not been correctly applied to Mt. Jefferson. Non-conforming use, snowmobiling, has long been present, so much so that it is considered the "crown jewel of western snowmobiling". Snowmobiling is not only present, it is famous for it, and defines snowmobiling in the Island Park area. The size and shape do not allow for effective management, since snowmobiling access to the area is in multiple ill-defined places along the long border of Targhee National Forest in Idaho. Management in the Targhee, as has been pointed out multiple times, allows and even facilitates snowmobiling. The Beaverhead-Deerlodge, nor its policies, does not control access to the area. Management and enforcement, that would prohibit snowmobiling in this famous area would be difficult, if not impossible.

Instead of acknowledging the long border between the Targhee and Beaverhead with multiple access points, the DEIS instead emphasizes Mt. Jefferson's brief proximity to BLM Wilderness Study Lands, now managed with no motorized use. There is only a short border, and no access from these lands. By ignoring the long Targhee border, the DEIS amazingly states, "This alternative provides for protection of high quality wilderness character, . . . and consistent management across jurisdictions while generally minimizing disruptions to established non-conforming uses and providing a balance between competing recreational values." The DEIS biases its presentation of the facts in order to support the Revised Plan.

The DEIS incorrectly changes the definition of wilderness characteristics to include subjective values, values which should be applied only when Congress acts. Lands only need be managed for eventual designation, concentrating on protecting physical resources, not subjective values. This incorrect application of values is especially blatant in Chapter 3, page 340 where the DEIS attempts to refute the benign effect snowmobiles have on the resource. It drags in a discussion on sound and tracks, both temporal in nature. This is a subjective and value laden "impact" which has no permanent impact on the resource.

The DEIS ventures beyond the scope of the agency's mandate to manage the resources when, also on page 340, it states, "The presence of non-conforming uses, in the interim, may lead to non-conforming uses opposed to wilderness designation." The DEIS thereby takes a political position to advocate additional wilderness designation, in violation of the agency's policy to manage the resource for all uses. It deliberately chooses wilderness type recreation at the expense of all others, especially in the case of Mt. Jefferson where snowmobiling is established and famous.

OMISSIONS IN THE DEIS ANALYSIS

As previously mentioned, the DEIS has failed to consider Targhee's management, which was established in a recently revised Forest Plan. This management allows winter use, and subsequent actions have even encouraged it. A snowmobile parking lot, authorized by Targhee and paid with Idaho State snowmobile funds, is located at the Blue Creek-Yale Kilgore Road junction. This lot facilitates access to the Mt. Jefferson area. Targhee has consistently worked with snowmobilers to facilitate access, although the routes are not groomed. When snowmobilers protested new tank trap closures in the Blue Creek road, the closures were modified to accommodate snowmobile use. In spite of numerous comments and requests to coordinate management with Targhee, Beaverhead-Deerlodge management has denied and ignored them.

Also ignoring past comment, the DEIS failed to acknowledge snowmobilers' cooperation with the agency in managing the area. With agency cooperation, they organized and conducted two clean-ups of the area during the summer. Yet subsequent project files make no reference to these volunteer efforts. The actual volume of litter was small, but the snowmobilers were happy to remove all that they found, stating that any litter in such a spectacular and pristine area is too much. Snowmobilers also agreed to a partial, temporary closure to study potential impacts on wolverine, and in subsequent years agreed to a partial closure, demonstrating their willingness to share the area with an extreme ski outfitter and his clients. This outfitter was not so willing to share; he demanded a total closure to snowmobilers.

The DEIS' economic modeling stopped at the Montana-Idaho border. It did not consider the multi-million dollar economic impact that a Jefferson closure would have on Island Park and Fremont County, Idaho. For example,

—Kevin Phillips, Island Park Polaris owner and Chamber of Commerce President has stated that 90 percent of his sled rentals go to Jefferson. Other business owners have similarly stated. They state that snowmobilers who stay in the Island Park area spend \$300 per day per person; \$400 per day if they rent a sled.

- Mt. Jefferson is the focal point of nationally known snowmobile businesses, for example Sno-West Magazine and other publications, and Starting Line Products.
 - It has long been famous as a site for snowmobile publicity photo shoots, videos, and performance testing. Since the mid-1980's Arctic Cat has had a test facility based in the area.
 - The Island Park real estate market is booming, partly because of the draw of Mt. Jefferson snowmobiling.
- The economic impact to Fremont County Idaho is so great that the DEIS and Revised Plan should describe how it intends to mitigate the impact of the Revised Plan as directed by Small Business Regulatory Enforcement Fairness Act of 1996 (SBREFA).

SBREFA AND THE MT. JEFFERSON AREA

In 1996, SBREFA was passed. This act expanded the authority of the Regulatory Flexibility Act (RFA) passed in 1980 to minimize the burden of federal regulations on small businesses. Under SBREFA, the agency proposing the regulation must describe the steps it has taken to minimize the impact of its regulation on small business. Agency compliance is subject to judicial review, and the Small Business Administration can file amicus briefs in support of small businesses.

SBREFA also provides for congressional review. Before any rule goes into effect, agencies are required to forward the rule to Congress. Major rules that have \$100 million impact on an economy can't go into effect until congressional review is complete. Congress may take up to 60 session days to review.

Although the economic impact of the Revised Plan's Mt. Jefferson closure on winter tourism and snowmobiling is significant, it may not rise to the \$100 million level. However, if rising real estate values in Island Park are considered, it easily meets and exceeds that threshold. Real estate values in a market like Island Park are dependent on the surroundings, and the subjective mystique of Mt. Jefferson and expansive winter recreation are a tremendous draw that can be quantified in rising real estate prices.

We therefore request that the DEIS and Revised Plan describe how it intends to mitigate the economic impact on Fremont County, Idaho, and forward that mitigation plan to Congress for review per SBREFA.

CONCLUSION

We request that the Mt. Jefferson area not be recommended for wilderness. As we have demonstrated, the DEIS' findings are flawed and skewed toward wilderness advocacy absent Congress' action. Instead, it should be assigned a management prescription that continues to allow snowmobiling seasonally while protecting the rugged, scenic resource for future generations. The snowmobile community and the BlueRibbon Coalition have already demonstrated willingness to protect this unique, wild, rugged area for current enjoyment and future generations. We hope to work with the Beaverhead-Deerlodge to continue this partnership in the future.

PREPARED STATEMENT OF THE MONTANA MULTIPLE USE ASSOCIATION

Senator Conrad Burns: Montana Multiple Use Association is a non-profit organization here in Montana that is working to protect the rights of Montanans. We are engaged in many resource issues across Montana, and would like to thank you for this grand opportunity to participate in this hearing.

Like you, we are frustrated with the process that we have to work with regarding management of our public land resources. We have seen the management of our resources neglected for the past 30 years, and it is time to make some changes to insure that our resources are managed for the benefit of the people rather than managed from the people.

In 1872, Congress enacted the "Mining Law." "Congress requires for the availability of minerals for the benefit of the United States of America." The United States Forest Service has used policy to go around this law. Forest plan revisions, travel planning and other projects currently underway, mention mineral resources in passing only. Access to our mineral resources must be protected, and current policy systematically eliminates this right guaranteed under the act.

In 1897, Congress enacted the "Organic Act." "National Forests are reserved for two purposes; (a) To maintain favorable conditions for water, and (b) To insure a continuous supply of timber." The United States Forest Service has forgot the forest in the forest reserves. Rather than standing on the laws that protect the renewable

resources, the forest service has ignored these resources in fear of litigation. The passing of the "Healthy Forest Initiative," is a step in the right direction, but falls short in providing for local management of these resources.

In 1934, Congress enacted the "Taylor Grazing Act." "Congress intended for the utilization of resources that are available on federal lands, therefore making these resources available not only to facilitate the success of area ranchers, but more importantly, this tool is used to manage the resources." Land management planning on federal lands, has given these surface resources to wildlife and have systematically left area ranchers unable to manage the resources. An example of this abuse can be found in *Hage v. United States*. Water rights and grazing rights of Montana ranchers are systematically being taken away. Constitutional rights that protect our citizens are also being dramatically impeded.

In 1960, Congress enacted the "Multiple Use and Sustained Yield Act." (a) "Congress requires the forest service to manage the renewable surface resources of the national forest for multiple use and sustained yield of the several products and services obtained there from." Of the many resource laws on the books, "MUSA," is one of the most abused neglected laws by the forest service. Multiple use of resources that are provided to benefit the people of the United States under the act must be upheld.

In 1964, Congress enacted the "Wilderness Act." "While the wilderness act set aside areas to be left un-managed, we must insure in future planning, that the other federal lands do not become defacto wilderness areas." In May 2005, President Bush revoked the "Clinton Roadless Rule." These defacto wilderness areas, have been neglected since their inclusion in the inventory process of "RARE I and RARE II." None of these areas have qualified as wilderness, nor has congress brought closure to this debacle of public land management. No public lands reserved under the organic act or the wilderness act can be included in the wilderness preservation system without an act of congress. The forest service has administratively included these and other public lands in this management scenario, and is a direct contravention of the Act.

In 1969, Congress enacted the "National Environmental Policy Act." "(a) While recognizing the further need to facilitate participation in the management of public land, this act requires for agencies to facilitate this participation through several different means. Beginning is scoping, through environmental analysis documents, the people of the United States are afforded the opportunity to participate in the decision making process." The "NEPA Act" is the one tool that protects the people from being eliminated from the process. The United States Forest Service has seen this law hamper the ability to efficiently manage our resources. On the other hand, the forest service regularly does not bring projects forward for public participation until after the predetermined alternative is chosen regarding a specific project. Many times we see these predetermined alternatives are developed behind closed doors resulting in sweetheart deals.

In 1970, Congress enacted the "Mining and Mineral Policy Act." "(a) The act further defines the need for mineral exploration for the benefit of the United States of America. Furthermore, while recognizing the environmental concerns, the benefit of mining to this country and its people must remain paramount." Forest Service planning, has continued to promote analysis paralysis in the availability of minerals here in this country. If our public lands do not provide for access, the resources contained therein, are rendered unavailable to benefit the people of the United States. Locatable minerals on public lands must be included in all management planning.

In 1974, Congress enacted the "Renewable Resource Planning Act." "While recognizing the need to manage our renewable resources congress made it clear that the forest service implements long term planning that would facilitate the health of our forests, while insuring we maintain a sustainable yield." The act further recognized that the transportation system of the national forest system lands is an integral part of the management programs. The forest service in the last several decades has not adhered to the act and have neglected the management of our public lands to the point of loss of value to the people of the United States.

In 1976, Congress enacted the "National Forest Management Act." (a) While the NFMA was adopted to further the definition of the management of national forest system lands, assurance was made not to repeal the mandates set forth in the Multiple Use and Sustained Yield Act." The management laws that are in effect to protect the resources for the benefit of the people of the United States of America. (b) NFMA, intended to further define the intention of the forest reserves, while not elevating ecological factors above any other multiple use, nor was there any intention for this law to require national forest planning to be contingent upon such considerations." The organic Act set aside forests to benefit all the people of the United

States, and the act further defines this intent. The trend of the forest service to allow ecological factors to supersede the law, must be stopped.

Intergovernmental Cooperation Act (31 U.S.C. section 6506c) (a) "Analysis Paralysis, has in large been a result of management decisions being made at national levels, resulting in the local management personnel being left to defend the decisions." We are all too familiar with this problem in the management of our public lands. Montana professional resource managers must be allowed to participate in the management planning. The citizens of Montana are protected under the Constitution of the United States, and the State of Montana to the right to participate. Local governments that depend on our natural resources must be involved in the process more than just by minimum notification requirements.

Endangered Species Act/Clean Water Act/Clean Air Act. "These and other environmental laws that have been enacted over the past 30+ years, play an important part in resource management. While maintaining concern for the environment, we must take care to insure that the cumulative effects of these laws do not prohibit the management of our resources for the future generations." We must remember that no ecological factor can be elevated over other multiple use of our public land resources. 36 CFR 294.12, The law affords the people of Montana an opportunity to move in a positive direction in resolving some of the management concerns we have. With that said, the law has created much confusion on how to proceed. Governor Schweitzer has publicly rejected this opportunity on behalf of Montana. He contends that the process is no more than a mandate on the state that ultimately will be decided in Washington. Please clarify this with Governor Schweitzer on behalf of the citizens of Montana. Roadless Areas are not wilderness, and the forest service must stop managing these lands under policy.

36 CFR 212.2, Resources many times are only thought of in the extraction of renewable and depletable resources. "Recreation" is also a resource, and is very important to Montana. The law for the first time since the "MUSYA," gives recreation a seat at the table in resource management of our public lands. The forest service system and non system roads and trails must be recorded in the roads and trails atlas as required by law. Forest planning has moved forward without including inventory of these roads and trails. The public has been submitted proposed actions in region 1 without any reference of existing roads and trails in the mapping or documentation that is required to be part of the proposal.

The management of public lands in region 1 is not being carried out under the intent of MUSYA. Many of our public lands are now being managed under a single use designation, by officials charged with managing our public lands.

From actions and communication provided by the Region 1 land managers, they genuinely feel they are in full control of the land, and the decisions are theirs to make without any accountability.

Wholesale changes in designation for areas and trails in order to reduce motorized use, instead of travel planning consisting of a logical approach to trail identification, mapping, marking and designation based on current use, and law must be addressed.

Region 1 is currently looking at hundreds of thousands of acres of public land in large block areas that are planned for closure to multiple use, rendering these lands to be managed for single use for less than 2 percent of the public.

Region 1 is currently under 2 forest plan revisions and numerous travel plans. It is apparent when one looks into these proposals that planning direction is resulting in 40 percent to 80 percent reduction in motorized use of the lands in the project areas.

Region 1 is under an aggressive planning schedule, and the public has found it near impossible to afford participation in the process. In addition, BLM planning requiring public involvement and comments simultaneously further prohibits site specific input from the citizens that work in Montana. Essentially, the forest service in region 1 is using this aggressive approach to complete a change in the management of our public lands in a few short months. The NEPA process is being stretched to its limits.

The forest atlas of roads and trails in region 1 is not worth the paper it is recorded on, as the bulk of districts in region 1 have not done required upkeep of these records, resulting in inaccurate transportation system management.

Analysis Paralysis continues with 1,500+ page Environmental Impact Statements filled with opinions, selective science, and very little statistical or factual data. Lack of critical analysis and no consistency has lead us to believe that there is no chance for a conclusion based on solid fact based analysis. Furthermore, data obtained in the Smoky Mountains, no more applies to the Rocky Mountains than data from here applies to the Smokies.

The trend in region 1 to ignore multiple use mandates by using an adaptive public land management program has resulted in our resources being devastated.

Montana Multiple Use Association is proud to be among the group of United States Citizens that believe in managing our resources to benefit all the people into the future. We look forward to working with you to achieve this goal.

On behalf of the citizens of Montana, I would be happy to testify at the hearing in Missoula, and will look forward to meeting with you at that time.

PREPARED STATEMENT OF THE MONTANA LOGGING ASSOCIATION

The Montana Logging Association (MLA) offers the following written comments on the above referenced congressional field hearing. The MLA represents approximately 600 independent logging contractors—each of which operates a family-owned enterprise that harvests and/or transports timber from forest to mill. In Montana, the vast majority of timberland is owned by government agencies—most notably the U.S. Forest Service—therefore, the economic welfare of MLA members is directly dependent upon the policies and actions of federal land managers.

It is with keen interest that we have not only reviewed the release of the new 2005 Planning Rule, but also participated in over 150 hours of forest plan meetings on the Beaverhead-Deerlodge, Flathead, Kootenai, Lolo and Bitterroot National Forests' over the course of the past few months.

As you are aware, instead of revising their forest plan with benefit of new provisions in the 2005 Rule, the Beaverhead-Deerlodge National Forest chose to revise their forest plan using the old 1982 Planning Rule. Whereas the new rule is a revolutionary change in the way the U.S. Forest Service approaches management planning and long-term ecosystem sustainability, we are very disappointed that the Beaverhead-Deerlodge NF declined to adopt the new planning rule in developing their long-term resource strategies.

Since 1897, the U.S. Forest Service has been charged with "Caring for the land and serving people." In addition to their dedication to this creed, public land managers must also balance a diverse set of goals and objectives with an understanding of the ecological processes at work on the landscape. Unfortunately, prolonged drought conditions, a declining timber-sale program, the removal/suppression of fire from the ecosystem and escalating appeals and litigation are all contributing factors to an unnatural and unhealthy distribution of several species across wide landscapes within Montana's national forest system.

At no other point in public land management history is the range of natural variability so out of balance; thus, we are at a critical land use planning juncture. Resource managers must have an inspirational vision and a science-based approach to maintaining a disturbance-dependent ecosystem by designing timber prescriptions and vegetative treatments that will ensure a desired future condition, while also enhancing and protecting resource values within both roaded and unroaded timberlands.

Because social, economic and ecological systems are complex and fluid, sustainability cannot be defined as a specific condition at a particular place and time. Rather, current conditions and trends over time are used to gauge progress in achieving the long-term social, economic, and ecological goals that define sustainability. A "sustainable" system is not just a catch phrase to indicate goods that are harvested and traded in the local economy. Inclusive within a sustainable system is the beneficial ecological attributes of clean water and air, resilience to disturbances, a diverse ecosystem and a desirable landscape for recreation and esthetics.

First—and most importantly—we support a recommitment to, and the reinstatement of, multiple-use mandates for all forest plan revisions regardless of which planning rule guides the revision process. The Multiple-Use Sustained Yield Act of 1960 and the National Forest Management Act of 1976 mandate that the National Forests are established and shall be administered for outdoor recreation, range, timber, watershed, and wildlife and fish purposes.

The preamble of the new 2005 Rule highlights that desired conditions are not the primary purpose of a plan. Instead, the "overall goal of managing the National Forest System lands . . . is to sustain the multiple-uses of its renewable resources in perpetuity while maintaining long-term productivity of the land. Resources are to be managed so they are utilized in the combination that will best meet the needs of the American people." Section 219.1(b) of the new rule clarifies that a forest plan can contribute to "three interrelated and interdependent elements" of sustainability—"social, economic and ecological." Also, Section 219.10 of the rule gives specific credence to the fact that a plan's contribution to sustaining social and economic systems within the plan area is just as significant as ecological sustainability.

Maintaining or restoring the health of the land enables the National Forest System to be good neighbors—by providing a sustainable flow of uses, values, benefits, products, services and recreational opportunities that are important to the economic sustainability of surrounding and adjacent communities.

Second, there are several aspects of the new planning rule that we support and strongly believe proposed planning on the BDNF would have benefited from. In brief we support: (a) forest plans as strategic documents; (b) an approach to plant and animal diversity that focuses on ecosystem diversity with additional protection for species not covered by the ecosystem coarse or fine filters; (c) the development of the Environmental Management System (EMS) as a third-party monitoring and auditing system to gauge sustainability success; (d) the evaluation, condition and trends reports; (e) species diversity; (f) species of concern; and (g) suitability of areas.

With this in mind, we would like to focus the remainder of our comments on the two plan components before you today—timber suitability and public access. The 2005 Planning Rules continue their emphasis on simplicity in at least five timber-related areas.

- NFMA requires the adoption of “regulations . . . specifying guidelines for land management plans” which “insure that timber will be harvested from National Forest System lands” and “insure that clear-cutting, seed-tree cutting, shelterwood cutting and other silvicultural procedures designed to regenerate an even-aged stand of timber shall be used.” Section 219.12(b)(2) of the 2005 Planning Rule states that the Forest Service Chief “must include in the Forest Service Directive System procedures to ensure that plans include the resource management guideline required by 16 U.S.C. 1604(g)(3).”
- NFMA further requires that the Forest Service calculate the long-term sustained yield capacity of a national forest and generally limit timber sales to a level equal to or less than that figure. Section 219.12(b)(1) of the new rule states that the Forest Service Chief “must include in the Forest Service Directive System procedures for estimating the quantity of timber than can be removed annually in perpetuity on a sustained-yield basis in accordance with 16 U.S.C. 1611.” The 1982 Rules refer to the Allowable Sale Quantity (ASQ) as a ceiling and as the timber sale level the plan intended to provide.
- NFMA also requires the establishment of “standards to insure that, prior to harvest, stands of trees . . . shall generally have reached the culmination of mean annual increment of growth.” The preamble in the 2005 Rule states that CMAI direction will be provided in the Agency Directives and asserts this is permissible “because NFMA does not require this guidance to be in the rule itself.”
- The 1982 Rule specifically states that timber production and harvest is an “objective” in forest planning. Under the 2005 Rule—unless lands are removed by congress—timber production and harvest is either a primary or secondary management objective.
- NFMA further requires that, during preparation and revision of a forest plan, the Forest Service must identify “lands which are not suited for timber production, considering physical, economic, and other pertinent factors.” On such suitable lands . . . “except for salvage sales or sales necessitated to protect other multiple-use values, no timber harvesting shall occur on such lands for a period of 10 years.”
- The 2005 Rule includes concise language on identifying lands “not suitable for timber production” in Section 219.12(a)(2). As under the 1982 rule: (1) identification occurs during preparation or revision of a forest plan; and (2) lands can be found not suitable where commercial “timber production would not be compatible with the achievement of desired conditions and objectives established by the plan for such lands.” However, Section 219(a)(2) eliminates most standards and detailed procedures for identifying unsuitable timberlands. Also, as prescribed by NFMA, this same section provides that “salvage sales or other harvest necessary for multiple-use objectives other than timber production may take place on areas that are not suitable for timber harvesting.”
- Section 219.12(a)(2)(ii) asserts that the unsuitability “identification is not a final decision compelling, approving, or prohibiting projects and activities.”

The issue of determining “timberland suitability” has been one of the most intensely debated issues at many of Montana’s forest plan revision meetings and, to date, is still being debated amongst planning staff. For those who would prefer to see more “suitable timberlands” designated “unsuitable,” the fight is on over Montana’s current 5,218,549 acres of “suitable timberlands;” therefore, it is imperative for the integrity of Montana’s remaining forest products and timber harvesting in-

frastructure that our “suitable timberlands” remain available for timber production, harvest and other multiple-use objectives.

The vegetative analysis on all forest plan revisions should model the allowable sale quantity. Modeling should not simply be based upon current budget constraints. Forest plans are zoning plans, not budget-based documents. Models based on current budgets cannot take into account future changes in budget conditions—such as recent changes to the K–V authority—future appropriation levels and shifts in national priorities. The ASQ or Timber Sale Program Quantity (TSPQ) must be based on actual resource allocation and capacity. The actual capability and long-term sustained yield calculations should be the basis for which Congress should approach appropriation requests and budget adjustments. Not only is a budget driven Forest Plan in direct violation of the National Environmental Protection Act (NEPA), but the trajectory of such a Plan cannot run parallel to capacity and resource need.

Another important consideration in determining “suitable timberlands” is the critical need to address millions of acres of dead and dying timber region-wide. All forests must identify salvage acres on non-congressionally-designated roaded and unroaded lands and prepare a mitigation plan as part of the forest plan revision process. Community Wildfire Protection Plans, Wildland Urban Interface acres, municipal watersheds and any forest system lands that are out of their historic range of variability must remain open to active resource management.

In addition to the importance of correctly identifying “suitable timberlands,” is the issue of classifying Inventoried Roadless Areas (IRAs). Discussions so far have indicated that most “suitable timberlands” are likely to remain classified as “suitable” as long as there is a road system present; however, there are thousands of acres of “suitable timberlands” in the current suitable base that do not have a road system, but meet all the criteria under NFMA as “suitable” for timber production or harvest. Yet, Region 1, in an effort to take the contentious road issue off the table, has proposed reclassifying current “suitable timberlands”—without roads—as part of the IRAs. This is totally unacceptable!!!

NFMA specifically directs classification criteria in identifying roadless characteristics—and “suitable timberlands” without roads is not within that direction. The recommendation on the Beaverhead-Deerlodge NF draft environmental impact statement, for example, proposes reclassifying approximately 500,000 acres of “suitable timberlands” as IRA based solely on the road issue.

It is too soon to determine if all forest plan revisions in Region One intend to reclassify unroaded “suitable timberlands” as IRAs; however all Forest Service starting options reveal this reclassification to be the proposed action. If each forest plan revision team follows this trend, Montana’s “suitable timberlands” could potentially diminish by an estimated 4 million acres! We reiterate, this capitulation of responsibility is totally unacceptable!!!

Prior to any such changes in land-use allocations, we strongly believe that there are several critical components pertaining to forest health and long-term industry sustainability that need to be completed and incorporated into Plan revisions:

1. All County/Community Wildfire Protection Plans (CWPPs) must be completed to assess local resource concerns.
2. All Wildland Urban Interface (WUI) lands must be open to active management.
3. Access to in-holdings, such as airstrips, mining claims, FAA radar and tower sites, reservoirs and State and private lands must be recognized.
4. Buffers around utility corridors must be established.
5. All current IRA boundaries must be reviewed for accuracy because the 5,050,710 acres identified in the in RARE I and RARE II process have been modified over time.
6. Lastly, the UM Bureau of Business and Economic Research report—that was requested by Montana’s congressional—must be incorporated into the discussion and decision process. Among that report’s conclusions are:

—“With no change in current harvest levels, Montana will likely see the closure of more than one of its largest timber processors, along with the shut-down of several smaller mills.”

—“A 15 percent increase in Montana’s annual timber harvest . . . would meet virtually all of the current milling capacity needs in Montana. . . .”

To be perfectly clear, the only entity that can provide the additional 15 percent of timber necessary to sustain Montana’s forest products industry is the U.S. Forest Service.

Senator Burns, as you know, active resource management on Forest Service System lands is complex. In order to meet forest plan objectives well into the future, resource managers must have the authority—and a professional timber-harvesting workforce—in order to achieve healthy forest sustainability. The Montana Logging Association stands ready to help with this important mission . . . and sincerely ap-

preciates this opportunity to comment and the committee's interest in Montana's forest planning.

LETTERS FROM STANLEY KEMPA, ET. AL.

SPIKE THOMPSON,
Forest Supervisor, Lewis and Clark National Forest, P.O. Box 869, Great Falls, MT.

DEAR SUPERVISOR THOMPSON: I strongly disagree with the trail closures for OHVs in the Proposed Action for Summer and Fall Recreation in the Jefferson Division of the Lewis and Clark National Forest. The Jefferson Division, in particular the Little Belt and Castle Mountain ranges, provide the last and best high-quality trail experiences for thousands of OHV riders from the surrounding communities and beyond. These areas have been used by Montana's OHV community for over 50 years. OHV use is and should be considered a traditional use of these areas.

There are currently many large blocks of National Forest lands which are off-limits to OHVs and provide high quality non-motorized opportunity in the Highwood Mountains, Snowy Mountains, Crazy Mountains, and on the Rocky Mountain Front. These areas are more than sufficient to accommodate people from the surrounding communities and beyond who wish to enjoy non-motorized recreational pursuits.

In addition, pending and imminent trail closures in the Helena, Gallatin, and Rocky Mountain Division of the Lewis and Clark National Forest will further concentrate OHV use to the Little Belt and Castle Mountains. These two areas are critical to providing high quality OHV recreation opportunities in Montana and should be managed to provide access for the entire public along with resource protection.

In addition, I strongly oppose the proposed large blocks of non-motorized winter recreation area the proposal would create. Snowmobiling does occur in many of these areas and many riders who use these areas were not represented in the negotiations that created the proposal. The proposal excluded several local snowmobile clubs, non-affiliated snowmobilers, cabin owners, and other stakeholders that should have been represented in order for the proposal to be considered legitimate.

Sincerely,

Stanley Kempa; James L. Smereck; Virginia E. Radovich; Aucille J. Blamey; Joyce E. Kempa; R.K. Kjelsrud; Phyllis Kjelsrud; Kaylin Fleming; Gene A. Meek; Dorthie Fullerton; Roger Bridgeford; Shawn L. Holm; Anne Hopper; Martin Storfa; Henry Woloszyn; James W. Krause; Erik P. Dubbe; Darnell A. Stucken; Alan S. Cape; Sharon Cape; Ken Bender; Ray Franz; Jon Dullum; Richard S. Johnson; Brad McMann; Dave McCane; Mike Pistelak; Steve Kaste; E.E. Sawyer; Blake A. Luse; Joan Gondeiro; Jess Reed; Todd I. Malin; Richard Gondeiro; Fred W. Maeder; Tim Toss; Carl J. Garner; Dustin Eddleman; Paul Bertoli; Robert Holt; John Seaman; Bob Watson; Daniel P. Watson; John A. Seitz; Gary Snyder; Robert A. Carroll; Connie Listoe; Wayne Listoe; Marty Hiatt; Judy Reed; Sheldon Clair Schearer; Gene Heller; Brian S. Franklin; Rob Beall; Casey Riggan; Shelly Riggan; Bill Price; Heather O'Brien; Kit Hom; Shaune O'Brien; Forrest Halge, Jr.; Scott McGary; Gary Hagfors; Anthony J. Sarica; John L. Richtea; Eric Picken; Furman Scott McCurley; Levi C. Eberl; Everett D. Lame, Jr.; Roger Talbott; David H. McVeda; Tom Mitcham; John W. Virgin; Melanie Ann Picken; J. Drew Hogan; Marc Sears; Pennie Vihinen; Ronald Vihinen; Katie Heiteman; Aaron Heiteman; Joey Zahara; Kay Witham; Jeff Allain; Douglas J. Magers; Michael Anderson; Kenneth R. Lay; Adolph Bertoli; Dianne Bertoli; Michele L. Mans; Jan F. Bicsak; Keith A. Bicsak; William L. Braun; David A. Davison; Tara Rosipal; Timothy D. Haas; Marlan Tipps; Bryan Marquart; Lorraine G. Richards; Kim Lorang; Russell J. Latka; Elmer B. Richards; Jon A. Legan; Sandra Latka; Rhett M. Stephenson; John Thomas; Sharid Lee; James R. Sangray, Jr.; Dave Parantea; Michael M. Myers; Scott C. Anderson; James B. Brown; Greg E. Spangelo; Brian R. Christianson; James R. Sangray, Sr.; Michael L. Stephenson; Tim Rohlf; Kim D. Anderson; Vance Canody; Adam Tranmer; Whitney Such; Linda Sangray; Rod Hagestad; Julie Zarr; Charlotte Kantorowicz; J.C. Kantorowicz; Greg Letz; Michael Joe Knox; Casey J. Kuhn; Joseph M. Eckeusley; Erik S. Farris; Richard A. Gallehow; Mitch Kellogg; Bryan Andersen; Ron Zarr; Leroy A. Weikum; Roxanne Weikum; Wayne Luksha; Bonnie Luksha; Bill Tamietti, Jr.; Bob Barber; Randall Rappe; Bonita Rappe; Claudia Barker; Deon Moldenhauer; Pamela J. Howard; Tony Rupnow; John

J. Zuris; Derek Gunenberg; James R. Thomson; Thomas G. Winjum; Eric Gysler; Bert Beattie; Edward L. Widell; Ryan Solyst; Thomas A. Warr; Michael L. McMann; Jim Hoxner; Jeff Widner; Velvajeau Merritt; Jay Warehime; Justin Augustine; Gary L. Collins; Clinton M. Oppelt; Dan Richards; Adam Davis; Chad Mans; Todd Mans; Dan McGurran; Fred Mital; Diane Guckeen; Vaughn Guckeen; James L. Hutchins; Donald F. Cotton; Jack Miller; Joe Ohgaim, Jr.; Glen Boettcher; and David Buck.

LETTERS FROM TAMMY BABER, ET. AL.

LESLIE W. THOMPSON.

Forest Supervisor, Lewis & Clark National Forest, P.O. Box 869, Great Falls, MT.

DEAR SUPERVISOR THOMPSON: I would like to go on the public record as being opposed to the OHV trail closures in the Proposed Jefferson Division Travel Management Plan. I believe the Little Belt Mountains serve all recreational users well and that shared use has been remarkably successful. There are very few conflicts on the trail system because there are few encounters because the area offers a large trail system that disperses users.

There are already ample non-motorized opportunities on the Rocky Mountain Front, Highwood Mountains, the Snowy Mountains, and in the Crazy Mountains. The Little Belt Mountains should remain an area where all trail users are welcome and can continue to share the trails.

The Deep Creek/Tenderfoot area has been successfully shared by motorized and non-motorized trail users for decades. In the most recent Wilderness Proposal, Montana's congressional delegation favored managing the area as a National Recreation Area, a designation that would allow the current mix of recreation but would protect the area by restricting resource extraction. I support this approach.

I also oppose closing trails in the Hoover Creek and Lost Fork of The Judith. These trails are important loop trail opportunities for motorized trail users. The September 1 trail closures in the Middle Fork are also an unreasonable approach to managing wildlife concerns. If hunting pressure is moving animals in the area, regulate the source rather than attempting to solve the issue by restricting recreational trail bike riding and ATV use.

I support efforts in the proposal to improve the loop trail system for OHVs. Sincerely,

Sincerely,

Tammy Baber; Jason Lander; Linda Ouiatt; Denise Maki; Lois A. Tester; Garth Benett; James L. Smereck; Kelly Sponheim; Rod Backer; Kevin Dyke; Brian Miller; Bob Nommensen; Virginia E. Radovich; Larry B. Coomis; Matthew S. Fleming; Sarah N. Fleming; Aucille J. Blamey; Stanley Kempa; Joyce E. Kempa; R.K. Kjelsrud; Dorthie Fullerton; Phyllis Kjelsrud; Gene A. Meek; Crissy Lopez; Rob Lopez; Robert Wagner; Clint Vertin; Lauren M. Fleming; Stephen C. Carpenter; David Fleming; Chris Fleming; Noel J. McClothlin; Sara McClothlin; Nathan Kenneth Fleming; Ed Mendenhall; Bradley Schwertz; Marc Correra; Jeff Haskell; Dennis Humphrey; Teresa Soncarty; Joseph F. Watson; Olaf M. Stimac; Olaf M. Stimac, Sr.; Kathleen Longewecker; James J. Reed; Chris Fulbright; Shelley Kuiper; D. Traber; MarcyLouise O'Ward; Mary Ellen Vischer; William Vischer; TanDee Doran; Carlos San Miguel; Dave Vance; Greg Ulmer; Forrest Deaton; Gary C. Ulmer; Wesley M. Seldmiat; Bret Manus; Jamie C. Popham; Danielle Cooper; Mark Severson; and Kaylin Fleming.

November 23, 2005

Spike Thompson, Supervisor
Lewis & Clark National Forest
PO Box 869
Great Falls, MT 59403-0869

Dear Spike,

I am offering the following comment on behalf of myself, my husband, my family and friends who have all recreated in the Little Belt Mountains for over 50 years. We have camped in the Logging Creek area with families since the '60's and have ridden motorcycles on the trails there as well. In the early years, I spent more time camping than riding due to two small boys who fished, hiked, picked flowers, and enjoyed the outdoors.

My husband and friends rode the Deep Creek area on a regular basis with many stories supporting their enjoyment. They were rained on, left motorcycles due to mechanical problems, and found porcupines had eaten the seat off when they returned with parts the next day to repair. Many of these friends have now passed away, but their children and grandchildren are now using the area much as he did in then.

In the 50's Vic and friends often rode from Great Falls to the Dry Fork fishing via Ming Coulee. The county road was abandoned cutting off access to the general public. In retrospect, this loss of access was something that should have been opposed. At that time there were many opportunities and places to ride and camp. We were busy raising our families, making a living and enjoying our free lives in Montana, so did nothing.

The first actual trail ride I went on was early in June, 1961. We camped on the top of the hill where the Taylor Hills trail started. We went with my mother and father in law and our first son who was less than a year old. Vic rode double taking his parents down to the Tenderfoot Creek fishing. I rode a Honda 50 and it was quite an experience. I don't remember if we caught any fish, but it was the beginning of my trail riding. (see Comment Picture Album)

We took trips down Daisy Creek in the summer, but the best for me was the trip out Strawberry Ridge, down Cow Coulee to the Smith River in the fall of the year. The loop down to Deep Creek Park and to the Dry Fork, coming back up either the switchbacks #320 to Blankenbaker Flats #307, or up the bottom and up to Monument Peak via #316. Many choices and opportunities were/are available and I've been ridden most of them.

The Pilgrim Creek, Tobin Gulch trail were another favorite ride. We had friends with a cabin in the Logging Creek area and spent many hours riding with all of our children, our two and their three. We rode up Big Timber Gulch, stopped and had coffee with Mr. Dunlap and heard many of his stories. From there we rode over the top and down Deer Creek to Pilgrim and back via Tobins Gulch trail. The main trail head at 303 was the usual starting point for the ride. Our favorite camping spot was just above the cattle guard on the right. We camped there many times with a group of friends in the '70's.

We purchased land on O'Brien Creek in 1964 with the money we had saved to remodel our kitchen, and the following year built a cabin. We snowmobiled from the cabin winters and rode motorcycles in the summer. My favorite ride was from Carpenter Creek road, up Lucy Park, along the ridge dropping down trail #735 to the South Fork of Hoover Creek. At that time the area was open and we rode many old mining trails (possibly U320 & U321) thru the area and up to Hoover Ridge, back via Pioneer Ridge. Being a spooky person at heart, the sight of the Glory Hole added memories for my nightmares. The return trip would find us wandering the many old mining roads on the Carpenter Creek side of the mountain. Luckily Vic has a good memory and sense of direction.

Memorable trips were down the South Fork of the Lost Fork, to the Middle Fork, then up and out Steiner. This trip was in 1964. At that time the lower end of the Lost Fork was a jeep road, as was King Creek and Woodchopper Ridge. There were many jeep type vehicles in that area in the 60's. In the 70's a group of our friends joined us for a trip to camp at the Middle Fork. One friend with a ton ½ 4X4 took all our camping equipment, his wife, their 3 children, one of mine and along with another couple in their Wallabug VW dune buggy, came down King Creek and were to meet up with us late in the day at the Middle Fork. The rest of us road out motorcycles out Sand Point, down Burris Cabin trail and down the Lost Fork to the Middle Fork and up to the camp. That trip was a memorable trip for all of us.

There are only a few of the trails in the mountain range that I haven't ridden, and a good share of them I rode with my son on the back of the motorcycle. Needless to say I was young and tough. Once the boys began to ride, it was really enjoyable for me. In those days, I was about the only woman who rode. Now, lots of women ride, and there are more families riding than in the 60's.

Our snowmobile excursions from the cabin on O'Brien Creek were varied and limited in length in the early days. With young children and a tight budget, the warm, water proof clothing of today were not available. The technology was a bit behind today's standards but snow seemed more abundant. The trips were shorter, more work breaking trail, but a great time. We would ride up O'Brien Creek to Moose Park, build a fire, have lunch, ride around the hillsides and return to a large pot of chili at our cabin. There were usually 10 to 12 sleds of with people of varying ages. If the snow conditions were good, we would go to Williams Mountain and once or twice a year would make the trip to Monument Peak, down to the Conway Ranch back over Rimrock Ridge and back to Neihart. This was before groomed trail days.

We spent one Christmas vacation at the cabin in the early 70's. We had good snow and mild temperatures. We took our old downhill ski's out to the Island Park area and skied the day away. At that time, we skied Shorty Creek and O'Brien Creek on the downhill skis. I had acquired boots and skis from friends upgrading equipment, and found more at the junk shops. With the snowmobile to haul you up the trail, you had a great experience without the crowds and lift lines. There were a few people who skied from the hill down O'Brien, but they usually did it in the spring when the snow conditions were right. They were on downhill skis at that time. Dr. Lester F. Howard and the Hasterlik family were some that we knew had made the trip with their friends.

In the Judith Restoration Project DEIS I found a name describing the type of snowmobiling we do. The word “bushwacker” was used for a hiker who does not follow a trail, but wanders at will around the country. To be a good winter “bushwacker” you must have a sled that is light, narrow, and has the ability to turn the track with out digging a hole or trench...a little technical tuning on the suspension helps. We just happen to have a number of this type of sleds, vintage '72-'73, and with a light throttle hand can take you most anywhere. The O'Brien, Shorty, Lone Tree, and many other drainages are our favorite haunts. We broke the first snowmobile track down Johnson Gulch and at that time, we knew everyone who owned a snowmobile. It was common knowledge that to follow a “bushwacker” track into the trees without knowing where you were going could lead you to a “tight” fit between in the trees. We use many of the roads around old clearcuts, connecting up with the Center Line Cattle Drive, from the power line road in O'Brien Park around the O'Brien Creek drainage, across the drainages to Harley Creek. The knob in Rocking Chair Park is a bushwacker challenge to get to the top, side hilling through and around the trees, over deadfall, each person using their own trail. (See Ehnes Bushwacker Map)

While this may seem like I am wandering, I wanted to try to convey to you our ‘experience’ when referring to the type of snowmobiling we do. There are as many types of snowmobilers as there are sizes of machines and people. Some like to cruise down the groomed trails, would not think of a swing thru the fresh snow off that hard packed trail; they might get stuck. Some enjoy climbing or high marking in the bowls. There are some that ride the groomed trails to get to a specific area offering a particular challenge. New sleds and the available technology offer a greater variety of people, older or with disabilities the chance to get out and enjoy the winter.

The winter closures put forward by MWA and MSA are narrow and eliminate the opportunity for many snowmobilers. There isn't scientific, reasonable support for closing the roadless areas to snowmobiles. The MWA website (now under re-construction) has advanced the view that all roadless areas should be wilderness, no snowmobiles, no motorcycles, period. The information on their pages is opinions, laced with untruths. Their letter in 1996 said it all, they committed to making the “Quiet Trails” an issue. (see 1. website & 2. MWA letter)

I attended the Interim Agreement meetings as a summer observer for MTVRA. The ground rules were set not to discuss what went on in the meetings with the press or non-attendees. I was not comfortable with lack of representation by the public at the discussions and was assured, more than once, that this process would form an alternative, the public would be involved, NEPA adhered to, and all comments would be given consideration. My perspective:

- The meetings were facilitated by John Gatchell, MWA.
- MWA had 3 members at all meetings.
- No one person represented the USFS at all meetings.
- The same 3 people representing MSA were at all the meetings.
- The Cross Country Ski Club representative always attended.
- Many MWA members were in and out of the meetings as suited their fancy.
- Minutes were sketchy to say the least.
- Meetings were at 2 week intervals to allow time to confer with members.
- The lead MSA representative was not familiar with the area and the only focus was the groomed trails and some play areas. The scope of representation was narrow.

- MSA agreed to items without discussion among themselves, let alone conferring with the local clubs that they were representing. The WSA area was only one of these instances.
- The roadless area closures was MWA's agenda.
- The USFS biologists attending did not recommend the proposed roadless area closures. They were honest and stated they would protect the areas where needed. MWA members' attitude was they knew better than the biologists and experts. USFS personnel were professional, made fair statements, and did not show bias. There was noticeable was a lack of a lead for the USFS.
- The agreement listed only the clubs that voted to support the agreement. While other clubs were listed on the original list, when they did not ratify, their club was left out of the documents. The clubs that ratified the agreement did not have full support of their members. The result was the appearance of broad based club support, which is not true.
- This was an interim closure forced on the general public without representation in private meetings, not open to the public.

The ironic part is that while these "talks" about travel planning stemmed from the Snowy appeal, the Snowy Mountains were never discussed and the summer appellants have never met. The closed process of the interim group agreement and this travel planning process has caused waves will shake the trust and possible collaboration that may have been forthcoming.

Collaborative efforts and negotiations can only succeed if the participants all have something to loose. The USFS and MWA continue to offer "meetings to reach an agreement" when the only user group to loose would be the motorized community, summer and winter.

This has been my personal "where I go, what trails I use and what 45 years of dealing with motorized use and the USFS process" statement. Area specific comments as well as pictures are included. I ask that you give my comments sincere consideration.

Sincerely,

Ramona Ehnes
622 13 Ave South
Great Falls, MT 59405

CC: Senator Conrad Burns
Senator Max Baucus
Representative Dennis Rehberg

COMMENT PICTURE ALBUM

Here are some pictures sharing some of the good times, good friends and beautiful country we have enjoyed over the years. I hope you appreciate the significance these pictures have for me and my family.

Mona Ehnes
622 13 Ave South
Great Falls, MT 59405



1971, A much younger version of myself.



Taylor Hills camp, we did catch fish...

Nick Ehnes, Mona & Will, Isabelle Ehnes in doorway.

Early June 1961



On the Tenderfoot fishing.

Nick, Mona & Honda 50, Isabelle (grandmother)& Will



1961 Summer Taylor Hills

Don Ehnes



1950's vintage Cushman scooter, modified for a trail scooter. Early 1960's.



Snowmobile built by Vic Ehnes in the early '60's. Will & Russ Ehnes



Above: Orin Shaulis and friend. Looks like ICE...
 Right: George Anderson, Orin & friend on small Harleys, a rider on a tote-goat scooters, who's name we don't know. This was an open area allowing cross country travel. Game trails as well as old trails established years ago were the just some of the routes used.

**HIGHWOOD MOUNTAINS
 1960-1961**



The days before snowmobiles:

A little snow and ice never kept the guys home. This trip was in January 1961 to the Highwoods. Upper left is the 1954 Triumph Cub motorcycle owned and ridden by Vic Ehnes. Above, friend Loren Gewald slides down the trail. Motorcycle on the right owned by Red Weber, picture taken by Vic, who did the first slide, Red came second, and finally the camera is out and Loren is recorded in action.

Left; Loren and Red pose for picture.



1966 Jack Golberg with Baldy in the background. Below, Lookout at Williams Mountain.

Even with the early sleds, the riders ranged far and wide in the Little Belt mountains.

Below: Notice the family snowmobile and hauler..... This is called recreation on a budget. 1965 Ski Doo & Ski Boose, Home made trailer and 1963 Volkswagon.



Family portrait. Russ, Will & Mona

Neihart: Unload and head for the cabin.



What a difference a few years make... Below, Will, Mona & Pug, Winter 1973-74 Moose Park

O'Brien Creek, Winter 1967-68
Jack Fauth on skis, Casper the dog, Vern Fauth on his 1964 Ski Doo double track, Will & Russ in Ski Boose and Mona on back of 1965 Ski Doo snowmobile. Note the lack of "snowmobile" suits. When your feet got cold, you got off or out of the sled and walked to warm your feet. If you sat in the snow, you were wet. Jack spent a couple of years being towed on skis before he got his own snowmobile.





1968

Group has lunch and plays in the snow, O'Brien Creek, clearing at bottom of Lone Pine Drainage.

These pictures show the areas we traveled over the years. Many of the friends are no longer with us, and we miss them and their good company.

Winter, 1973-74

Jack & Nancy Golberg, Cindy & Lori, Nancy's daughters, Will & Pug, Russ and Mona. We all rode together, Neihart, Logging Creek, Jumping Creek, and too many to mention. We were out on sunny days, caught in blizzards, with many different temperatures and just as many different snow conditions. We always knew where our kids were and what they were doing... They were with us.



Here a group of fellows coming back from a trip around by the Conway Ranch. As you can see from the pictures, the weather and the snow is ever changing. Above you can see the 6 or so inches for fresh snow, while on the left, you can see the sleds are hardly sinking, solid base. Top left, the tracks in the snow are 10 inches deep, fresh powder...

All pictures were taken by Vic Ehnes are prior to digital cameras. These are all from 35 mm slides, scanned and transferred to a computer file by Russ Ehnes



1968-69

Vern Fauth and faithful dog Casper,
Jim Sibert visit on a mountain top.

1972

Lookout at Williams Mountain.
A regular stop on a days outing.

Again, notice the difference in
the snow conditions.



1973

O'Brien Creek
Fresh snow....

Pushing snow over the hood
while breaking trail..

The ultimate condition.....



1969

How the weather can change.... Here we start from Ming Coulee area with John Smaker taking us down to the Smith River from his place near the Ironside Place to his trailer camp on the Smith River. The road down is called "Pack Down". John was a unique character, living in a one room house, with coffee that was as thick as chocolate syrup, a clock that was never on "Nixon time" (daylight savings time) and a bottle of strong spirits that you were always offered a small drink, seems it was stout too..

John, LeRoy Nopen, Harold Funk, LeRoy's son, Vern Fauth, Vic & Mona Ehnes.

Right, Vern at the Smith River
The clouds blew over, the sun came out and it was a beautiful day.

Below: John in front of his cabin just above the river.

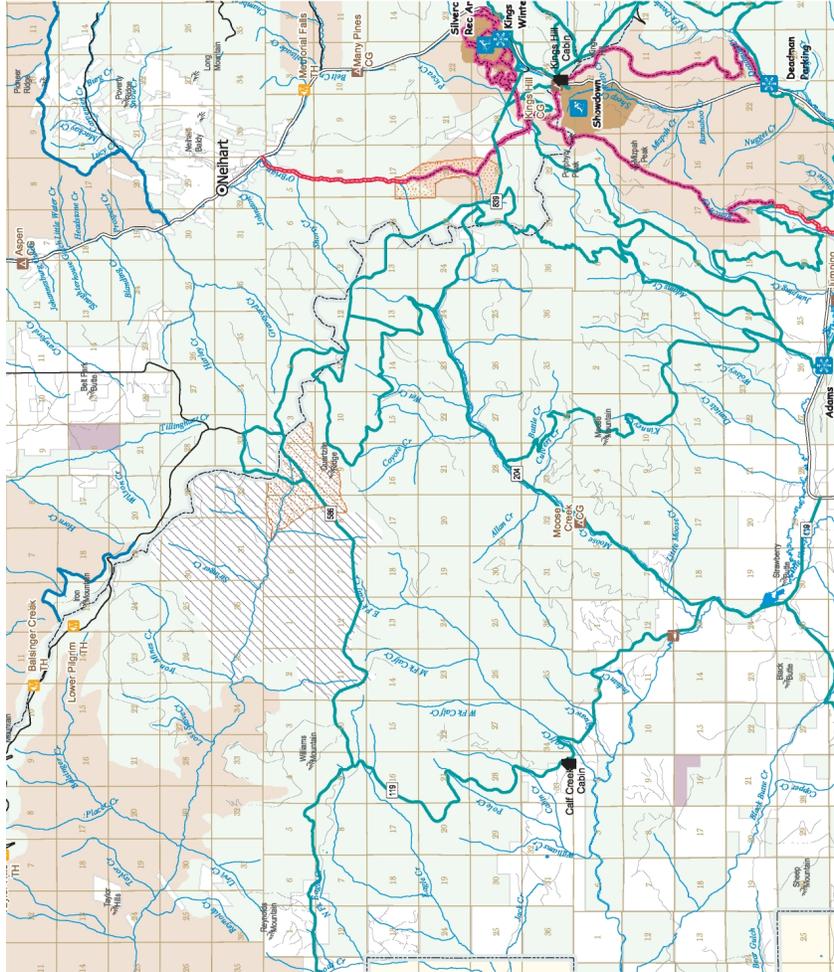


As these pictures show, the snow conditions vary, and will determine when and where you travel. John had invited us to come out and ride with him, but lack of snow had kept us away until this weekend.

When it snows, we could, would and did go...

Great Memories.....







September 3, 1996

Dear Montana Wilderness Association member:

Have you ever been on a backcountry trip when the quiet of wilderness was spoiled by the noisy passage of an off-road vehicle? Are you alarmed at how motorized recreation threatens to establish itself in even the most remote wild areas of Montana?

Of the many threats to Montana's wild country, one may be the most dangerous and underestimated of all – the increasing use of motorized vehicles on the state's most pristine public lands, including unprotected roadless areas, congressionally designated Wilderness Study Areas, and even established wilderness areas and national parks!

The problem of motorized use in the backcountry has become so severe that the Montana Wilderness Association is mounting a special effort – the "Quiet Trails Campaign" – to confront it. The campaign will require an unanticipated financial commitment from MWA, so I write this letter to ask you to make a special contribution to support this important work.

Contrary to a widespread desire to keep public wildlands free of motorized travel, a relatively small number of motorized recreationists have succeeded in opening many roadless areas to off-road vehicle (ORV) use. The motorized interests have been successful not only because they are generously funded by vehicle manufacturers, but because some federal and state agencies have been co-opted to promote motorized recreation through special tax programs, budgetary incentives, and the lure of make-work construction projects.

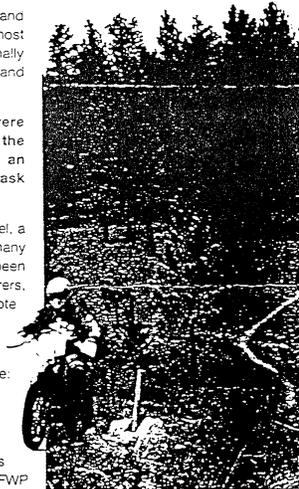
The most notable threats of motorized recreation to Montana's wildlands include:

- The Montana Department of Fish, Wildlife and Parks (DFWP) now spends over one million dollars annually on programs for motor boating, snowmobiling, motorcycling, and all-terrain vehicle recreation. DFWP now dedicates a significant part of its energy to promoting and funding ORV use in roadless areas and even congressionally designated wilderness study areas. For example, DFWP has placed newspaper ads ("Hey, Dirt Bike Riders!") to encourage 7-12 year-old children to learn how to ride dirtbikes in state-sponsored "safety" classes. Loaner equipment is provided.

- The Forest Service, responsible for administering 663,000 acres in seven congressionally designated Wilderness Study Areas "so as to maintain their presently existing wilderness character and potential for inclusion in the National Wilderness Preservation System," has embarked on a number of projects which defy this mandate.

In the Sapphire Mountains Wilderness Study Area, the Forest Service plans a two-year reconstruction project to provide roads for off-road vehicle users.

In the Gallatin Range of southwest Montana, the 165,000-acre Hyalite-Porcupine-Buffalo Horn Wilderness Study Area is under assault. In 1995, the Forest Service reconstructed the Buffalo Horn Trail to 4-wheel dimensions, and this year the agency proposes to do the same with the Porcupine Trail.



Motorcycle on Mt. Helena Trail
(Helena National Forest), which is
signed to prohibit motorized use.

Keeping it wild since 1958

Montana Wilderness Association
P.O. Box 635 Helena, Montana 59624
406-443-7350 mwa@desktop.org

- The Great Burn, a 95,000-acre roadless area northwest of Missoula in the Lolo National Forest, has long been recommended for wilderness not only by MWA, but by the Forest Service itself. Yet the Forest Service recently met with DFWP and Bureau of Land Management officials to discuss a vast expansion of snowmobile trails in the Great Burn area.

- Motorized use in designated wilderness areas is illegal, but a report from the Gardner Ranger District, Gallatin National Forest, documents 472 confirmed instances of snow machine trespass into the Absaroka-Beartooth Wilderness from December, 1995, to March, 1996. In the Mission Mountain Wilderness, MWA has repeatedly pressured the Forest Service to stop snowmobile trespass, but even two recent deaths from snowmobiling accidents within the wilderness have not sparked the agency to enforce the law.

- For the proposed Continental Divide Trail in Montana, the Forest Service proposes to make 500 of 700 miles of trails open to motor vehicles. The areas targeted by the Forest Service for motorized use include even agency-recommended wilderness areas, such as Blackfoot Meadows, West Big Hole, Italian Peaks, and the Centennial Range.

- In Glacier National Park, the Park Service recently enacted a "temporary" ban of jet skis, but the sky above Glacier is abuzz with helicopter overflights that frighten wildlife and annoy hikers.

The Montana Wilderness Association is engaged in all these issues, but the current surge of proposals to motorize Montana's finest wild areas requires a new level of activism from conservationists. That's why we've initiated the Quiet Trails Campaign, and that's why we need your special contribution to support the project.

The Quiet Trails Campaign will integrate several strategies:

- First, we will conduct extensive field work to produce a detailed inventory of maps, photos, and documentation of actual and proposed motorized use in Montana wild areas.

- Comprehensive information will be used to produce publications, inform MWA members and the public, generate media coverage, and substantiate administrative and legal objections to ORV projects.

- In the legal arena, MWA will challenge the Forest Service to respect the law and enforce the Wilderness Act of 1964 and the Montana Wilderness Study Act of 1977. This effort will involve considerable expense for historical research, attorney fees, and court costs.

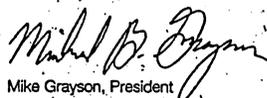
- Most importantly, MWA will fight horsepower with people power. MWA's community organizers, together with help hired specifically for the campaign, will build quiet trail coalitions with the many conservation and outdoor organizations that advocate muscle-powered recreation but are not currently engaged in the issues. By tapping and directing the existing public sentiment for quiet trails, we can build broad support for the protection of wilderness values in Montana's priceless wild country.

Right now, motorized encroachments into Montana's roadless areas is not a well understood or hotly contested public lands issue. MWA's Quiet Trails Campaign will make it one!

I hope this letter arrives at a time when you are savoring great summer visits to Montana's backcountry. I hope also that you will reflect a moment on how quiet trails are integral to a healthy ecosystem and serve as a cornerstone to a fulfilling wilderness experience.

Please, contribute to the Quiet Trails Campaign and help to protect the "hush of the land" in Montana's wild places.

Keep it wild!



Mike Grayson, President

American Wildlands/Roadless Proposal

The new roadless rule fails to adequately protect our nation's wildlands. These lands provide the best quality wildlife and aquatic habitat in our country. Our nation's roadless lands are federal lands and should not be governed by state governors beholden to extractive industry and lacking natural resource management expertise. Millions of Americans supported the original Roadless Rule and gave the Forest Service clear direction on how to protect these wild places. Logging, oil and gas development, and roadbuilding should not be allowed on roadless lands and the Forest Service must develop a rule that fully protects these wild places

The Northern Rockies could be especially hard hit by this dangerous proposal. One-third of the nation's roadless lands -- nearly 20 million acres -- are located in Idaho (9.3 million acres), Montana (6.4 million acres) and Wyoming (3.3 million acres). Roadless lands around Yellowstone National Park, in the Wyoming Range, and in Idaho's Salmon-Selway ecosystem provide some of the best wildlife habitat and aquatic resources in the country. These lands serve as home to grizzly bears, lynx, vast elk herds, and native trout. They also provide key wildlife corridors for the many species that need to travel during the year to find seasonal food, shelter and healthy, unrelated mates.

MWA

Submit comments to the Forest Service and send copies to President Bush and Montana's congressional delegation. Letters to the editor will help to educate the public about the threats posed by this proposal.

Make these points:

- Request that the proposed change—undoing the Roadless Rule—be withdrawn immediately. The proposed change must NOT be implemented.
- Demand that the original Roadless Area Conservation Rule, enacted by the Clinton Administration, be fully installed, now. It should NOT be replaced by this ill-conceived governors' petition process.
- Let the Forest Service know that the lands in question belong to all of the public—not just governors and local politicians. The proposed rule is an abdication of the federal responsibility to manage these lands.
- Tell the Forest Service that Montanans and millions of Americans want federal roadless areas protected, and not opened up for development. Let them know you DO NOT approve of *any* rule alteration that would allow these lands to be degraded in *any* way.
- State your support for wilderness designation for these inventoried roadless lands. Urge your congressional representatives and the President to fully support such designation

PROTECT SW MONTANA'S WILDERNESS TRAILS Thank the Forest Service for closing trails to ATVs. [Ask them to close more!](#)

A Message from David Cronenwett, the new Beaverhead Field Organizer for the Montana Wilderness Association. MWA recently opened a field office in Dillon, which will focus on protection of public wildlands on the Beaverhead National Forest and Bureau of Land Management lands.

A Good Decision by Forest Managers Needs to be Applauded.

The Beaverhead-Deerlodge Forest recently announced that it will close 63 trail miles from All-Terrain Vehicles in the West Pioneers, and will rehabilitate the trails, to meet the terms of the 1977 Wilderness Study Areas Act.

It's important that conservationists back progressive decisions that protect wilderness qualities in roadless areas. Although motorbikes and snowmachine travel will still be permitted in the West Pioneers Wilderness Study Area, the greatest threat to the landscape is the growing number of ATVs. The Beaverhead Forest has recognized this with the closure order, and has acted appropriately. They need to be congratulated.

Thank them when they're right – tell them when they're wrong.

Unfortunately, the agency plans to allow ATVs to proceed up trails to the WSA boundary. This will encourage illegal trespass into the West Pioneers and will be an enforcement nightmare.

Please let the Forest Service know that the closure order will be more effective and realistic if the routes in question are closed at the trailheads.

Congratulate the Forest Managers on their good decision to close the trails to All-Terrain Vehicles - now urge that the Forest Service follow through with the common sense, logical step of stopping ATV travel at the trailheads.

BLM-Dillon

The BLM plan promotes motorized traffic over wild values. The BLM wants to place motorized traffic and hikers on the same trails. Hikers do not disturb motorized traffic, but the noise of motors can be heard for miles and greatly disturbs a quiet trail user's experience. Quiet trail users need quiet trails.

ATVs scatter wildlife, cause erosion, gouge out vulnerable mountain streams, and drag noxious weeds into the backcountry – weeds that destroy grazing lands for wild game.

The BLM plan is wildly out of balance: too much motorized traffic, not enough places for quiet hiking and hunting.

The BLM plan does not provide for motor free recreation in the winter. The needs of cross country skiers, snowshoers and traditional hunters are completely ignored. Under the preferred alternative almost all BLM lands in southwest Montana will be open to motorized traffic in the winter.

The plan must be balanced and made fair.

Kootenai Natl Forest

Prime candidates for wilderness designation have been ignored by the Forest Service in past forest plans. We can't let this happen again.

NOT ENOUGH WILDERNESS ACRES IN A WILD LANDSCAPE

Of the 2.2 million acres of the Kootenai National Forest and the 2.47 million acres of the Idaho Panhandle National Forests, only 94,000 acres are designated wilderness. The Cabinet Mountains Wilderness (CMW) in the Kootenai National Forest is the single wilderness area in this vast, wild region.

The Yaak Valley, almost a million acres of temperate rainforest, the most biologically diverse landscape in the Northern Rockies, doesn't have a single acre of wilderness!

It's time for a change. We need wilderness now for northwest Montana and northern Idaho! Don't let them shortchange us on wilderness again!

NEW THREATS, MORE MOTORS

New trends are putting roadless areas in danger. The primary threat comes from the expanding use of ORVs (off-road vehicles). Motorized vehicle users are demanding ATVs and snowmobiles be allowed into pristine areas in the Kootenai and Panhandle Forests.

Motorized vehicles will destroy the peace, serenity, and wilderness values of this landscape. ORVs scatter wildlife, destroy the wild experience for hikers and backpackers, and ruin opportunities for hunters.

Rutted trails, erosion, and noxious weeds spread by ATVs can alter the wild values of the landscape and remove it from wilderness consideration!

It's up to us to stop it.

WHAT YOU CAN DO

Contact the Forest Service and let them know you want YOUR wild lands protected in the new forest plans. Include these points in your letter:

1. Protect roadless lands by designating them as wilderness.
2. Restrict motorized use to established road systems and designated trails.
3. Keep roadless areas motor-free.
4. Restrict snowmobile access in Wilderness Study and Roadless Areas.

If you can write from personal experience in roadless areas, please do so. Let the Forest Service know YOUR feelings and beliefs, your love of the landscape. Tell them about family adventures and good times hunting, fishing, and hiking in wild lands. Describe your favorite roadless areas (see the list on the next page) that you feel deserve wilderness protection. The Forest Service is receptive to personal anecdotes of time spent in the forest.

Write now – the time in which you can make YOUR voice heard is short.

Rocky Mtn Front

"The fragile nature of the Rocky Mountain Front is so eggshell thin, that attempting to accommodate motorized recreational uses over the majority of this land will destroy the quiet and the solitude that so many people today are seeking," said Chuck Blixrud, a Rocky Mountain Front outfitter.

The public cited a variety of concerns in opposing ORV use on the Front. These concerns include:

- a broadly-held appreciation that the Rocky Mountain Front is a unique and beautiful wild landscape that should be protected from damage and development.
- a desire to preserve essential wildlife habitat in the Rocky Mountain Front;
- the need to maintain quiet, meditative places for future generations;
- the importance of safeguarding culturally-significant lands in the Front;
- an appreciation of the damage to landscape and wildlife habitat that ORVs create;
- the impracticality of rehabilitating the Front once ORV damage occurs; and
- fears that destructive commercial oil and gas development would follow the development of recreational roads in the Rocky Mountain Front.

Responses strongly favored hiking and horse travel on the Front, where generations of horseback riders, hunters, hikers, outfitters, Native

Americans, elk and bear, local residents and visitors alike, have shared the trails on this unique landscape, enjoying centuries-old quiet and traditional experiences. With ORV sales in the United States tripling over the past decade, and advanced technology increasing their speed and power, these traditional uses are increasingly threatened. Loud noise and exhaust which displace walkers and horseback riders, inadvertent introduction of noxious weeds, and illegal trails which fragment premier wildlife habitat and hunting areas, are just some of the serious problems that come with ORV use on the Front.

"You should know that I had a snowmobile, and still have an ATV and a Harley, and I love to ride them all," writes J.L. Ashmore of Seely Lake, Montana. "That doesn't mean that riders, like me, have the need or the right to ride everywhere. One of the places we don't need to be riding is the Rocky Mountain Front."

It is not surprising that the overwhelming majority of responses supported maintaining the Rocky Mountain Front as a roadless wilderness. For years Montanans have worked to preserve the wildlife and quiet grandeur of the Front:

THE PRYOR MOUNTAINS – GOING, GOING, GONE?

Located 45 miles south of Billings, the Pryors are one of the most ecologically diverse areas in Montana, and potential opportunities for quiet recreation activities abundant. The region contains ten distinct biological systems, ranging from Great Basin desert to subalpine meadows. These areas support a variety of wildlife, including bighorn sheep, black bears, golden eagles, mule deer, and more than 200 species of birds. In addition, the Pryors contain numerous rare plants, including some found nowhere else in the world.

However, the proliferation of roads and illegal motorized traffic (map) threatens quiet recreationists, wildlife, historical sites, and the fragile landscapes of the Pryors. Twice as many miles of roads exist (over 200 miles) than are currently authorized by the Forest Service (100 miles). This ever-growing spiderweb of roads has caused significant erosion, noxious weed spread, vegetation damage, and wildlife habitat fragmentation.

MWA-EWC VISION OF THE PRYORS

The Eastern Wildlands Chapter of Montana Wilderness Association has crafted a careful, [scientifically-based plan \(map\)](#) for the use of public lands in the Pryors. The plan provides for areas of motorized use where ATVs may be ridden and areas of non-motorized use, where traditional activities such as hiking, horseback riding, hunting, fishing, and bird watching may be enjoyed in the quiet splendor of nature. Ranchers would continue to have grazing rights for their cattle in these non-motorized areas.

It is a [fair, balanced plan \(map\)](#) that gives something to everyone. It preserves the integrity of the Pryors and insures the future of its wildlife, historical artifacts, and spectacular scenery.

Without foresight and appropriate planning, many of the unique qualities of the Pryors will soon be lost in a maze of roads and a haze of dust. MWA-EWC efforts included substantial on-the-ground road inventories, and volunteers found multiple instances of erosion, noxious weeds, and extensive road widening, including illegal ten-track "roads" across fragile cryptobiotic soils that take centuries to heal.

To prevent this, the planning agencies must see the enormous benefit that such rich and unique lands can provide to the surrounding communities for generations to come. Long-term goals based on a future vision are necessary to protect the Pryors.

Creating quiet riding and hiking areas is the most effective and beneficial method to provide the greatest good for the greatest number of recreationists visiting the Pryors. Zoning is also the best option to guarantee that the integrity of the land and its vast resources will be preserved for the enjoyment of future generations.

FOREST SERVICE PROPOSES MOTORIZATION OF THE PRYORS

The Forest Service [Travel Management Proposal \(map\)](#) does not include any quiet areas in the Pryors. It does include detailed maps that clearly indicate the status of roads. It also imposes seasonal restrictions on certain roads during times when the likelihood of erosion and vegetation damage from motorized use is the highest. In addition, the proposal closes many roads that are currently illegal and should not, in fact, even exist. This much is good.

However, in all three management areas in the Pryors, the proposal's "Desired Condition" is to provide opportunities for motorized use. **Nowhere** are quiet recreation activities mentioned, and **nowhere** does the proposal offer opportunities to hike, hunt, backpack, camp, watch birds, ride horses, mountain bike, or snowshoe in quiet areas in the Pryors.

The Forest Service proposal contains too many roads to protect the valuable natural, cultural, and recreational resources in the Pryors. Illegal motorized traffic has caused significant damage in the past, and widespread motorized use has had a negative impact on the ability of quiet recreationists to enjoy the Pryors. Quiet users need quiet riding and hiking areas!

The 2004 USFS proposal leaves merely 23% of the land more than ¼ mile from a road. It leaves a scant 11% of the Pryors more than a mile from a road (minimum necessary for secure elk habitat). We and wildlife need some quiet zones away from the roar of traffic!

THE BEARTOOTH MOUNTAINS

The Custer National Forest also includes Absaroka/Beartooth Wilderness Area and bordering lands to the north and east (collectively called "The Beartooth Front"). The Wilderness Area contains steep mountains, lakes, glaciated valleys, unique tundra, and alpine meadows, and it provides opportunities for primitive non-motorized recreation. The Beartooth Front includes rangeland, grasslands, volcanic outcrops, ridges, mountains, and drainages. It provides opportunities for both motorized and non-motorized recreation, and portions of this area experience extensive visitor use that is expected to increase in future years.

FOREST SERVICE PROPOSAL FOR THE BEARTOOTH

In the Beartooths, the proposal suggests many commendable actions, including the creation of a non-motorized recreation area in Meyers Creek/Bad Canyon area, the closure of many unnecessary spurs off main roads, and the closure of several user-created roads.

The proposal also calls for additional recreation facilities and campsites in the heavily-used areas of the Front, but it does not provide a timeline or specific suggestions for the location of these facilities.

One major cause for concern is that the Forest Service proposes to open up 69,000 acres to snowmobiles. Another problem with the proposal is the authorization to drive 100 yards off a road to a dispersed campsite. A significant number of spur roads have been created by such practices in the past, and to prevent future damage and road creation in the Beartooths, the Forest Service should prohibit driving off roads to dispersed campsites.

PUBLIC INPUT COUNTS

Custer National Forest is accepting public comment on the Beartooth District 2004 Travel Management Proposal until September 1. The Forest Service will evaluate the comments for use in developing travel management alternatives

FIND A CHAPTER NEAR YOU

- [Flathead-Kootenai Chapter](#) (Northwest Montana)
- [Wild Divide Chapter](#) (Continental Divide)
- [Island Range Chapter](#) (Central Montana)
- [Madison-Gallatin Chapter](#) (Southwest Montana)
- [Eastern Wildlands Chapter](#) (Eastern Montana)

GENERAL COMMENTS:

Reference: Region 6 Transportation System documents have provisions for mixed use, dual use roads including signing, with a break down of types of vehicles. I would encourage the ID team to consider using these guidelines. The larger All Terrain Vehicles have become a popular vehicle. With nothing in place to cover this vehicle, the Forest will be up against another larger vehicle wanting to go anywhere and ATV Class I vehicle goes. We must look forward to how you will manage the next 10-15 years if the only motorized vehicles classified are the current popular vehicles. (See information attached on vehicle)

The evaluation and decision-making must take into account that the total area of the Lewis and Clark National Forest equals 1,862,000 acres and out of that total 562,000 acres or 30.2% is designated wilderness. Note that this ratio is even more lopsided toward non-motorized opportunities when the management of defacto wilderness areas including roadless areas and the proposed Rocky Mountain District travel plan are factored in. Therefore, this statistic supports the management of all of the remaining 1,300,000 acres (including roadless and the Rocky Mountain Ranger District) or 69.8% of the forest for multiple-uses. Every multiple-use acre must remain available for multiple-uses in order to meet the needs of 93% of the public who visit Lewis and Clark National Forest for multiple-uses. Every reasonable multiple-use acre must remain available for multiple-uses in order to maintain a reasonable balance of opportunities. The proposed plan does not meet the basic needs of the public for multiple-use opportunities, a proper allocation of multiple-use recreation opportunities and the laws requiring multiple-use management of these lands. These are serious and significant deficiencies surrounding the proposed plan and we ask that adequate corrective action (a revised starting plan) be taken quickly to address these issues.

Provision should be made in any alternatives for an allowance to allow motorized vehicle to park off trail. Camping is allowed 300 feet from the trail, but nothing in the 3 State OHV Decision is specific for allowing a vehicle to be parked off trail. To leave a vehicle parked right beside a trail while you fish or hunt on foot is asking for trouble. This would appear to be an oversight. While retrieving game is prohibited, this is a totally different scenario. Please consider this addition to your "to do" list.

Recreational OHV and using an OHV for hunting are two separate issues and need to be recognized and managed differently. Many hunters do not consider themselves an OHV rider, they simply look at the OHV as a means of transportation as they would a pickup. Many of the complaints that have a negative impact on recreational OHV's is from the hunting season.

We would recommend the Forest Travel Plan set a sound limit of 96db. The technology for equipment is simple, and the technology for having a quiet OHV is there also. The general public and many OHVers do not appreciate the loud machines that some use.

R6 SUPPLEMENT FSM-7730-2003-1 EFFECTIVE DATE: April 10, 2003 DURATION: This supplement is effective until superseded or removed.	7731 Page 5 of 7
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**FSM 7700 – TRANSPORTATION SYSTEM
CHAPTER 30 – OPERATION AND MAINTENANCE**

7731 - EXHIBIT 01
ATV Vehicle Classes

Class I All Terrain Vehicle:

- Motorized, off-highway recreational vehicle 50 inches or less in width.
- Dry weight of **800** pounds or less.
- Travels on three or more low pressure tires.
- Has a saddle or seat for the operator.
- Designed for, or capable of, cross-country travel on, or immediately over, land, water, sand, snow, ice, marsh, swampland or other natural terrain.

Class II All Terrain Vehicle:

- Weighs more than a Class I all – terrain vehicle and less than 8,000 pounds.
- Is designed for, or capable of, cross-country travel on, or immediately over, land, water, sand, snow, ice, marsh, swampland or other natural terrain.
- Is actually being operated off a highway.

Class III All Terrain vehicle:

- Off – highway motorcycle.
- Dry weight of 600 pounds or less.
- Travels on two tires.



Comments specific to Map #1 Tenderfoot Deep Creek Area

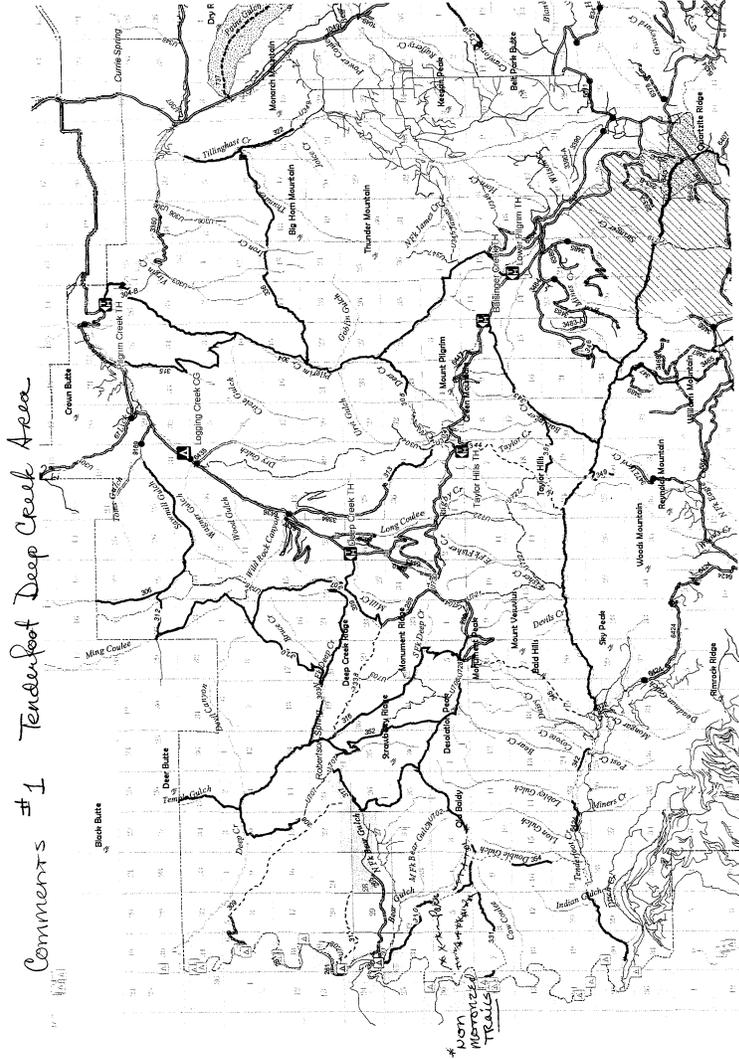
- The proposal showing the Deep Creek Area as non-motorized is a replica of Pat Williams additions to failed Wilderness Bills in the early 1990's. Including an area in a failed bill is not justification for the proposed change. The response issued in 1991 regarding this addition is attached.

Non-motorized opportunities can be provided but not by displacing other forest recreationists. The Sawmill Gulch area is a prime example. Proposed at one time in the SOPA quarterly: **Sawmill Trailhead:** The Sawmill Gulch trail along the northern border of the Belt Creek Ranger District begins and ends in private land. As a result, the only easy way to access this portion of the District is from the Deep Creek Trailhead located approximately 4-5 miles south on Logging Creek road. Under this proposal, a small trailhead would be constructed on Logging Creek Road to the north of Logging Creek campground. The site location is being reviewed this fall with a proposed location on the north side of Logging Creek road in Section 31, T16N, R6E.

Sawmill Gulch trail reroute: Currently, Sawmill Gulch trail ends in private land at its western terminus. The approximate western 1.5 miles of Sawmill Gulch trail would be rerouted to the southeast to provide for a linkage with the proposed trailhead to be located approximately ½ mile north of the Logging Creek campground.
- More trailheads are needed to help disperse recreation of all types. An idea advanced: **Tillinghast Trailhead:** Currently there is no easy way for the public to access the Tillinghast and Bighorn trails located west/southwest of Monarch. Under this proposal, a small trailhead would be constructed on the north end of Belt Park to allow for 4-6 vehicles and stock trailer parking. The legal description for this site is Section 22, T15N, R7E.

Tillinghast trail reroute: In conjunction with the construction of the Tillinghast trailhead, the Belt Creek Ranger District proposes to reroute the Tillinghast trail to improve user access. Currently the trail's southern terminus ends at private land. Under the reroute proposal, the southern end of the trail would be rerouted to the east on an existing user-created trail across National Forest land to a juncture with Belt Park Road (#6511) in Section 22, R7E, T15N.
- Trailhead construction must be given attention due to the increase in size of the horse trailers. In meeting with the horsemen that use the Snowy Mtn area, the comment was made that the parking areas planned were not sufficient for the current use and vehicle size.
- Trail 311 re-construction was committed by the USFS as a condition of the land swap in the Deep Creek Area. This trail should be constructed to ATV trail width, connecting with trail 238 which would allow public access to the Smith River Area by ATV's. Trail 309 would make an additional ATV opportunity connecting to trail 311.

- The apparent bias towards making the Smith River Area non-motorized is narrow in scope. The river corridor is lined with private property and cabins (92 out of 118 shoreline miles private). The issue of enforcement of these far reaching closures has not been addressed. The use of the trails coming off of Smith River is extensive, particularly during hunting season. I have personally hiked in the area and know of three trails that are not on any of the maps presented. At that time they were non-motorized trails but with the property changes that have taken place along the river, this may not be the current condition. The practice of not showing existing non-motorized routes on the proposal has led to the statement regarding only 35+ miles of non-motorized trail, while ignoring the many miles of unmapped trails and the total acres of area available to any non-motorized recreationists.
- Areas currently used for snowmobiling are highlighted. This does not constitute support for designating the other area as non-motorized. The area, from Smith River south, has opportunities for snowmobiling limited by the snow conditions and changes greatly from year to year. Land owners along the Smith River use snowmobiles in the area, and have for many years. Snow conditions affect winter non-motorized use as well. Again, enforcement of the proposal of non-motorized areas has not been addressed. Site specific area restrictions for wildlife issues, proposed by the USFS biologist with documentation supporting the restriction can and will be supported by the motorized community.
- If you refer to the USFS map of 1939, you will see the trails you identify as “U303,” “U304,” “U306” and “U721” are identified as trails. Existing trails on the 1939 map not identified as “U” trails are on Loblely /Bear Creek area. The ‘user created’ routes that have been identified on the map issued in February 2005 are routes that have been on the ground since the early 1900’s. The trails and routes on the ground and in use must be considered when estimating future travel needs.
- Trail 343 from Divide Road to connector with #351 is an important segment to the single track riders, completing a loop from the east side of the area.



MA: BAUCUS
MONTANA

WASHINGTON, DC
(202) 224-2881
MONTANA TOLL FREE NUMBER
1-800-332-4106

United States Senate

WASHINGTON, DC 20510-2602

November 26, 1991

Mr. Robert Hanson
Box 652
White Sulphur Springs, Montana 59645

Dear Bob:

Thank you for your recent letter on behalf of the Smith River Coordinated Resources Management Commission (SRCRMC).

As you are probably aware, Senator Burns and I have agreed upon a settlement of Montana's roadless lands issue. Among the areas we have discussed and now agree upon is Tenderfoot-Deep Creek. We have agreed to designate a portion of this area for special management; a National Recreation Area. I've enclosed a copy of a map showing our agreed upon boundary for this area.

As you can see, we have drawn the boundary so as to eliminate all of the conflict with private inholdings in the south. This boundary adjustment should address many of the potential concerns you and the SRCRMC may have about the National Recreation Area designation.

In addition, it is important to keep in mind that the special management designation is not wilderness; it would have no impact on any existing rights -- such as water rights -- in the area. Special Management designation merely puts Congress on record as recognizing Tenderfoot-Deep Creek's outstanding recreational potential. It provides general management guidance to the Forest Service to manage this area for dispersed recreation. This includes motorized recreation, where appropriate under the law and the Lewis and Clark Forest Travel Plan.

I hope this letter responds to your concerns. Please feel free to let me know if you have any additional questions or concerns.

With best personal regards, I am

Sincerely,



MSB/mar
enclosure

BILLINGS
(406) 657-8790

BOZEMAN
(406) 586-6104

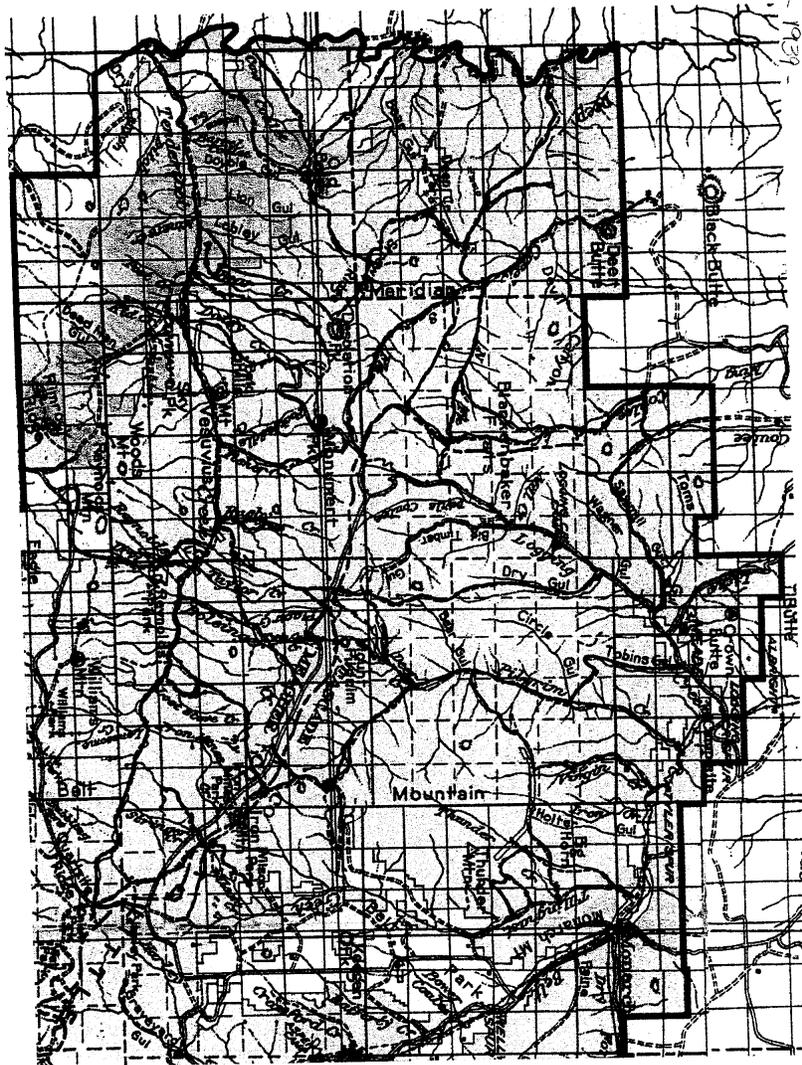
BUTTE
(406) 782-8700

GREAT FALLS
(406) 761-1574

HELENA
(406) 449-5480

KALISPELL
(406) 756-1150

MISSOULA
(406) 328-3123



Comments Specific to Map 2, Hoover/Running Wolf

- Hoover Creek Complex: Trails 735, 741, connecting to #736 are important to the loop system of single track trails for the motorcycle riders. Trail designation must examine the fisheries problem and if the sedimentation is at a problem level, all trail use should be eliminated until relocation and/or mitigation is achieved.
- Pioneer Ridge trail should be open to ATV use, with connectors designated on existing routes to the Chamberlain road system.
- Existing roads in the Otti Park area should be classified dual use and worked into existing routes on the ground to create opportunities for the dispersed campers in the Dry Fork Area. U314, McKay is just one example. If the routes are determined to be proposed for closure, specific reasons for the decisions should be available for the public. If compliance for the travel plan is an objective, opportunities must exist and there must be defensible reasons for the closures. If the opportunity exists for a group to adopt a trail and correct problems, there are willing participants.
- The winter snowmobile closure does not address the cabin owners, and the opportunities that abound when the snow conditions are good. This area was proposed closed in the winter travel agreement meetings only because it was a roadless area. Objections to this closure were not raised because there was no representation of the public. The representatives from the Montana Snowmobile Association were only concerned with the groomed trail system and the play areas immediately adjacent to those trails.
- The Inventoried Roadless Areas Peterson Mountain, Gibson Peak, Big Baldy Mountain areas should be left open to snowmobile use. The only area restrictions acceptable are areas identified by the USFS biologist, and supported by documentation, for wildlife issues. The wildlife overlay maps produced for the winter meetings did not support these large area closures.
- Tucken Mountain Area (highlighted in pink): The proposed new ATV trails were drawn on a flat map on terrain that would be extremely difficult to construct a quality ATV trail. By quality, a trail that will not cause erosion and that is safe to ride with moderate difficulty.

Comments Specific to Map #3, Middle Fork/Judith Area

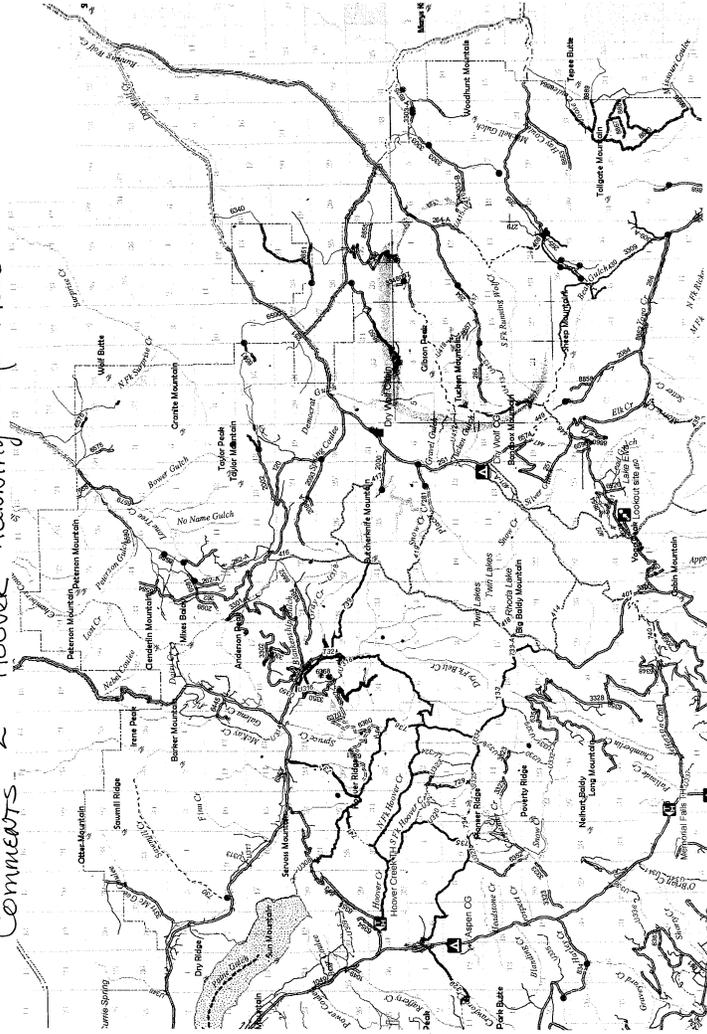
- Designation of dual use on all roads from Kings Hill north and south around the Middle Fork WSA would increase the opportunities for loops by connecting existing routes and trails on the ground.
- Road 251 is a necessary connection from the Jefferson Creek area to Silver Gulch and the Dry Wolf area. Just prior to the saddle at Yogo Peak, the road side hills around a steep rocky area. This area drifts full and is not passable until July. A jeep road had been created many years ago to bypass the snow drifts. This road has been rehabbed and closed. The construction of a trail bypassing this section would be a high priority for the motorized community and with the placement of the trail where it should be, resource damage would be minimized and compliance would be achieved. Area marked on the map.

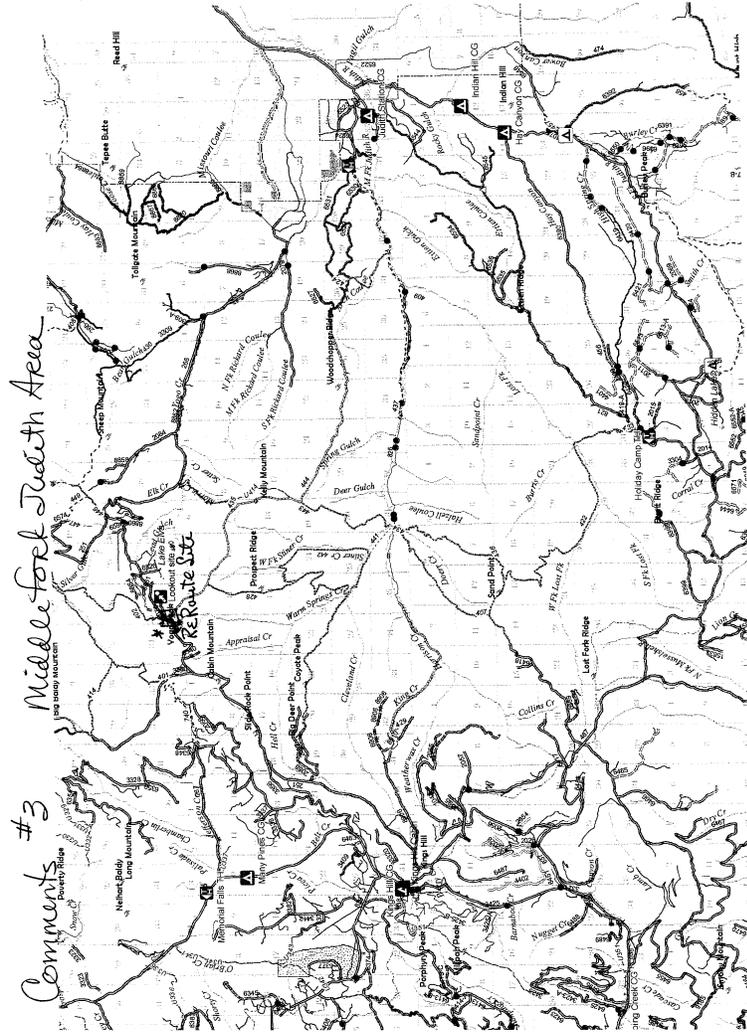


- Information on trails in this area show that the WSA shows 20 miles of trails abandoned. While these trails are no longer available for motorized travel, the trails are available for non-motorized travel. (see attached, page 322). The practice of not showing existing non-motorized routes on the proposal has led to the statement regarding only 35+ miles of non-motorized trail, while ignoring the many miles of unmapped trails and the total acres of area available to any non-motorized recreationists.

- Trails 422 and 433 have a high value to single track motorized travel. They are the connection for north/south travel for riders from Billings, Bozeman, Lewistown, Great Falls, etc. Trail 422 travels through the 1988 burn area and is open primarily because of the motorized community continual clearing efforts. Many are able to take family members who cannot ride or hike down trail 433 to the Lost Fork to fish. This is a good example of access for older and disabled people that does not require special trail construction, simply using the existing infrastructure.
- Replacement of the King Creek trail/road should be addressed. The process that took place for the Judith Restoration Project should have been completed with a decision. While much of the background work done for this project will no doubt be used in the documentation for the alternatives, the public that was involved has been left to wonder just what transpired and will the travel planning process take the same direction, a fast trip to no where.
- The WSA should not have been closed for motorized winter travel. The 9th Circuit Court decision was not considered. How much money the USFS put into that case has never been stated, but the motorized community invested over \$40,000. At what point, when does past decisions become obsolete? How many answers before an issue finally settled? Is the history of an area ever examined prior to new plans or proposals? (see attached comment on WSA decision.)
- The closure dates for motorized use should remain at October 15 of each year. The FWP supported this date as shown in the letters from 1983 testify. (see attached)

2 Hoover Running Wolf Area.
Comments





**Table III-95. Middle Fork Judith WSA and Roadless Area
Factors Influencing Wilderness and Roadless Character From 1977 to 2002**

OPPORTUNITY FOR A PRIMITIVE RECREATION EXPERIENCE*	FACTOR IN WSA AREA	FACTOR IN ROADLESS AREA	EFFECT OF ACTIVITY SINCE 1977		
			Positive	Negative	No Change
REC. OPPORTUNITY (SUMMER) 6.9 mi. fewer 4x4 roads 2.1 mi. fewer OHV trails 0.1 mi. fewer hiking / horse trails 11.1 mi. roads closed to motorized Undeveloped landscapes	X X X X X	X	X X X		X X
ALLOW ATV USE Woodchopper Trail 444 King Creek Trail 429	X X				X X
REC. OPPORTUNITY (WINTER) Snowmobile areas Non-motorized areas 1.5 mi. groomed snowmobile trail	X X X	X		X	
CONVERT ROAD TO TRAIL 10.3 mi. Woodchopper Trail 444 2.0 mi. Yogo Creek Trail 450 8.4 mi. Lost Fork Trail 409 5.7 mi. Sand Point Ridge Trail 436 1.6 mi. West Fork Lost Fork Trail 422 5.9 mi. King Creek Trail 429 2.0 mi. Coyote Peak Trail 441 35.9 mi. TOTAL	X X X X X X X		X X X X X X X		
ADDITIONAL TRAILS 1.8 mi. connect Prospect Ridge 0.7 mi. connect Steiner Trail 3.2 mi. add Schaeffer Trail 7.2 mi. TOTAL	X X X				X X X
REDUCTION IN TRAILS 6.0 mi. Warm Springs abandoned 3.0 mi. Three Mile abandoned 4.0 mi. Burris Trail abandoned 7.0 mi. Sandpoint abandoned 20.0 mi. TOTAL	X X X X		X X X X		

* Opportunity for a Primitive Recreation Experience is a wilderness characteristic.

Impacts to a primitive recreation experience include changes to the physical setting, addition or deletion of roads and trails, other activities that disrupt the sense of remoteness, and changes to the social experience of users.

**Table III-96. Middle Fork Judith WSA and Roadless Area
Factors Influencing Wilderness and Roadless Character From 1977 to 2002**

REMOTENESS*	FACTOR IN WSA AREA	FACTOR IN ROADLESS AREA	EFFECT OF ACTIVITY SINCE 1977		
			Positive	Negative	No Change
ACCESS TO AREA Holiday Camp Trailhead Middle Fork Trailhead Yogo-Morris Trailhead	N/A N/A	X			X X X

* Remoteness is an evaluation characteristic of classified roadless areas.

Impacts to remoteness include changes in legal access to the area, and changes in vegetative or topographic screening.

WSA Decision comment:

On May 21, 2001 United States District Court Judge Donald Molloy made a ruling that ordered that the Forest Service is enjoined from taking any actions in any Montana Wilderness Study Area that diminishes the wilderness character of the area as it existed in 1977. **In 1977, all of the roads and trails in the wilderness study areas were open to motorized access and motorized recreation.** Judge Molloy's ruling also stated as it existed in 1977 and **does not require the Forest Service to reduce motorized access and recreation to less than it was in 1977.**

The proposed action does not recognize that the Montana Wilderness Act of 1977 allows for motorized use in the wilderness study areas as discussed in Judge Molloy's Order. Page 6 of Judge Molloy's Order cites the House Report on the original legislation:

The use of off-road vehicles, while generally prohibited in designated wilderness areas, is entirely appropriate in wilderness study areas..... Nothing in S. 393 will prohibit the use of off-road vehicles unless the normal Forest Service planning process.... Determines off-road vehicle use to be inappropriate in a given area... [I]t is the intention of the committee that the areas in S. 393 remain open to off-road vehicle use unless and until they are formally designated as wilderness.

The proposed action with its complete elimination winter of motorized access and recreation is not in agreement with the intent of the Montana Wilderness Act of 1977, which specifically stated that motorized use would be allowable until formally designated as wilderness.

Furthermore Judge Molloy on Page 12 of his Order stated:

...Congress did not require a "freeze" of all activity. It contemplated that use levels might fluctuate and that the types of motorized vehicles might change. Congress intended that existing and new or different uses should be accommodate, so long as they did not undermine an area's potential for Wilderness designation and so long as they did not undermine the area's presently existing Wilderness character.

Judge Molloy states on pages 12 and 13 of his ruling: *In short, the statute requires the Forest Service to strike – and maintain – a balance between wilderness character and motorized use. Because Congress did not require a "freeze," it did not require that only those segments of the Wilderness Study Areas already open to motorized activity should remain so, or that those segments already closed should remain so. Indeed, that plan could result in "freezing out" motorized use altogether or, on the other hand, in precluding Wilderness designation, due to degradation of the wilderness character (for example, by excessive use impacts) over time. Instead, Congress required that the Forest Service ensure continuing opportunities for enjoyment of the study areas by use of motorized vehicles, as well as continuing opportunities for enjoyment of the study areas' character qua wilderness.*

Judge Molloy's statements on page 19 of the Order:

IT IS FURTHER ORDERED that the United States Forest Service is ENJOINED from taking any action in any Montana Wilderness Study Area that diminishes the wilderness character of the area as it existed in 1977 or that diminishes the area's potential for inclusion in the National Wilderness Preservation System.

IT IS FURTHER ORDERED that the United States Forest Service is ENJOINED to take reasonable steps to restore the wilderness character of any Montana Wilderness Study Area as it existing in 1977 if the area's wilderness character or its potential for inclusion in the National Wilderness Preservation System has been diminished since 1977.

The existing level of motorized access and recreational roads and trails does not diminish the potential for the wilderness study areas to be a designated Wilderness Area at some date in the future.

- First, nearly all of these features were in existence in 1977. The miles of roads or trails added since 1977 are relatively insignificant (see Table III-95. Middle Fork Judith WSA & Roadless Area, attached).
- Secondly, motorized roads and trails that fall within a future designated wilderness area can be reclaimed by natural process or rehabilitation efforts to non-motorized wilderness trail standards.
- Thirdly, many designated wilderness areas have incorporated old mines, trails, and roads that have been reclaimed by natural processes and/or rehabilitation efforts.
- Fourthly, existing wilderness areas include many trails that are similar to the roads and trails in the East Pioneers and West Big Hole areas. For example, the main trails into the Bob Marshall and Scapegoat Wilderness at Benchmark, Holland Lake, and Indian Meadows are very similar to many primitive roads and motorized trails in non-wilderness areas. These trails in designated wilderness could be negotiated by motorcycles, atvs or even jeeps if they were open to motorized use.

Therefore, the continued existence and use of motorized roads and trails does not significantly affect the potential for the wilderness study areas to be designated wilderness in the future and is therefore, within the requirements of the 1977 Act and May 21, 2001 Order.

A reasonable alternative would be one that just meets Judge Molloy's requirements.

Congress was specific in its intentions for the 1977 Wilderness Study Act. **The wilderness study areas were to remain reasonably undiminished in primitive character and were to remain open to motorized access and motorized recreation until Congress and the President have acted on them for either wilderness designation or to return them to the public for multiple-uses.** A reasonable alternative that would meet both obligations could be structured around the concept of a Back Country Recreation Area

MONTANA
DEPARTMENT OF
FISH, WILDLIFE AND PARKS



Rural Route 4041
 Great Falls, MT 59405
 October 3, 1983

Letter

Mr. Mike Goggins
 Lewis and Clark National Forest
 1601 2 Avenue North
 Great Falls, MT 59401

Dear Mike:

Enclosed are maps with some additional Montana Department of Fish, Wildlife & Parks fishing accesses, recreation areas, and one wildlife management area drawn in. Also, enclosed is a copy of a letter to Larry Froberg.

The following is a summary of the received comments on the Lewis and Clark Forest travel plan:

General: Recommend all trails open to bikes remain open until 10/15 annually.

Highwoods:

1. Recommend that Forest Service put their end of road gate on the Group W Cable road up to Baldy Mountain at the Number Four Salt Ground rather than on the creek where it was before. This would get hunters within good walking distance from the ridge top and afford a relatively flat parking area for vehicles.

Big Snowies:

1. Attempt to get more access to National Forest on north, north-east, and west sides of Big Snowies.
2. Recommend that Forest Service open and keep open all designated trails for motorcycle and snowmobile use.

Rocky Mountain Front:

1. Recommend "no restrictions" for the following trails: Numbers 107, 114, 117, 108, 154, 126, 127 and 137.
2. Recommend that Beroute Trail #153 in vicinity of mountain goat mineral lick be placed below ridgeline, close to the creek to screen the trail from view of the lick.

October 3, 1983
Page 2

Belts:

1. Woodchopper Ridge, Stiner Creek Trail, Dlorr Creek Trail, Halzell Creek Trail, Calf Creek Trail, Indian Creek Trail, Burris Cabin Trail, Burris Creek Trail, West Fork and South Fork of Judith River Trails, and Lost Fork Trail should be open to bikes until 10/15.
2. Recommend Sandpoint Ridge Road open to all motorized vehicles to old four wheel vehicle road closure sign year long. From sign east, open to bikes at least until 10/15.
3. Road 2019 from Spring Creek to Lion Creek should be closed to snowmobiles after December 1.

Castles:

1. Recommend West Castles have all trails be designated trails and open to bikes and snowmobiles year long.

Sincerely,

DANIEL P. VINCENT
REGIONAL SUPERVISOR


By: Kerry Constan
Oil & Gas Coordinator

DPV/KC/do

MONTANA
DEPARTMENT OF
FISH, WILDLIFE AND PARKS



Rural Route 4041,
Great Falls, Montana
59405
September 30, 1983

Mr. Larry Froberg
District Ranger
U. S. Forest Service
Stanford, Montana 59479

Dear Larry:

I recently reviewed the travel plan update that the Supervisor's Office submitted to us, and was dismayed to see that you had closed the entire Lost Fork area to motorized use year around.

When we met with you and some of your staff earlier this year to discuss the travel plan update, we were assured that there would not be much change from the original plan on your District. As you remember, we said the Woodchopper Trail could be opened to Oct. 15 each year from early June, with no detrimental wildlife effects, and the use of the Lost and Middle Forks of the Judith River between early June and Oct. 15 each year also had no adverse wildlife effects. We did ask that you move the road closure sign downstream on the Lost Fork to the actual crossing, as we had several transects below there that were advantageous to check on bikes. The use of motorbikes saved us much time in checking our several transects several times a year. Also, the fishery biologist checks his study plots by using bikes in the Lost Fork.

Since the use of motorbikes is very advantageous to us in checking our transects and many people use the several trails in the Lost Fork for recreation (by motorbike) we urge you to leave the Lost Fork as it was, open to bikes from early June to Oct. 15 each year. Many of the grouse hunters use motorbikes to get into these areas and there is no current adverse effects from this type use to the wildlife.

Thanks, Larry, for your consideration of this matter, as it is important to us to be able to use the Lost Fork Trails.

Sincerely,

James L. Mitchell,
Region 4 Wildlife Manager

JLM/ez



November 23, 2005

Spike Thompson, Supervisor
 Lewis & Clark National Forest
 PO Box 869
 Great Falls, MT 59403-0869

Dear Spike,

These comments are being provided to you on behalf of the Montana Trail Vehicle Riders Association (MTVRA) and the Great Falls Trail Bike Riders Association (GFTBRA) and are in regards to the Summer and Winter Travel Plan Proposals for the Jefferson Division of the Lewis and Clark National Forest .

GENERAL COMMENTS

The proposal you have presented the public was in the form of a map only, with virtually no supporting documentation. The lack of information made it difficult to comment on many aspects of the proposal because there was no way for the public to know what the rationale for site specific changes might be. The only way to obtain information was to inquire at the open-house meetings from Forest Service (FS) staff or call the district offices. In many instances we were told by staff that the information we received from them was "speculation or their assumptions" and that they didn't have any documentation to support their comments either.

We are also concerned that the inventoried, unclassified routes that are present on earlier maps produced by the FS were not addressed in the proposal. When we asked about the trails that we inventoried but did not show up on the map we were told that "if it doesn't show on the map, assume we proposed to close it". Both the MTVRA and GFTBRA supported the Three State OHV EIS, and the newly released OHV Rule, which call for an inventory of existing routes and analysis of those routes. It is unclear to us, based on the information we've been presented, that these routes have been analyzed.

The Jefferson Division, especially the Little Belt Mountain Range, serve as the primary source of high quality OHV loop opportunities, with enough quantity to satisfy OHV users needs, within a reasonable driving distance for many Montana communities including Great Falls, Belt, Stanford, Geysers, Judith Gap, Hobson, Lewistown, Grass Range, Harlowton, Cascade, Billings, Livingston, and Laurel. In addition, as a result of restrictions in the Helena National Forest and the Gallatin National Forest many riders from Helena and Bozeman travel to the Little Belt Mountains because of the high quality single track motorcycle trail system. Not only are OHV users coming to the Little Belt Mountains, it appears as though they are being encouraged to seek OHV opportunities on the L&C NF. Evidence of this can be seen on the Gallatin NF web site

Creating a positive future for off-highway vehicle recreation

where the recreation page mentions fishing, hiking, cross-country skiing, other skiing, and snowmobiling but does not mention OHVs. However, the page does direct the user to “check the Lewis and Clark National Forest for more recreational opportunities.” (see attached)

The areas have been used by Montana families who have enjoyed motorized access on these lands for as long as 60 years. Several of these families are in the fourth generation of motorized users. In addition, the majority of the trail maintenance in the Little Belt Mountains is done by motorized volunteers. They have donated thousands of hours in volunteer time. Motorized clubs have worked with agencies to secure nearly \$250,000 in grants to fund trail maintenance.

Access for disabled and senior citizens must be considered. As our population ages, more and more seniors are turning to motorized recreation for their national forest experience. Limiting access to areas to ‘non-motorized use only’ essentially eliminates our disabled citizens and a large segment of seniors from these areas.

While we understand the need for the existing non-motorized areas, including designated Wilderness areas, we strongly oppose the additional proposed “large blocks” of non-motorized areas created by the proposal in the Deep Creek, Hoover Creek, and Lost Fork of the Judith Areas. There is a need for a balance of motorized and non-motorized opportunities and we believe that the current situation provides a fair balance. Non-motorized opportunities and large blocks of non-motorized areas already exist in the Snowy Mountains, the Highwood Mountains, the Rocky Mountains, and the Crazy Mountains to meet the desire of non-motorized recreationists.

The trail system in the area currently serves the entire recreation community yet there is absolutely no data to quantify the level of use by any segment of the recreation public or justify trail restrictions. Based on comments from the motorcycle and ATV community, horsemen, bicycle riders, and individual hikers we’ve spoken with, encounters with other trail users are extremely infrequent and nearly always pleasant for all parties. Based on the experiences of our members alone we have to ask these questions: Who are you closing the trails for? What conflicts or circumstances on the ground have led you to believe that there is sufficient interaction or conflict between motorized and non-motorized users to warrant closures?

The President of the Charlie Russell Back Country Horseman rode over 200 miles in the Little Belts this past season and encountered two trail bikes and no other users. Our members have very similar experiences. He also opposes the closures because he recognizes the value of the volunteer trail maintenance done by the OHV community. He understands that without our efforts the quality of the trails would quickly deteriorate.

Also, the Great Falls Bicycle Club wrote in an e-mail “However, many of our favorite trails will become unridable if trail bikes are not allowed to use them as proposed in the draft plan. Trail bikes clear the deadfall and smooth the trail surface on most of the Little Belt Single track trails we enjoy.”

According to a recent Forest service survey, 29% of Montanans participate in OHV activities. We believe there has been a tendency for the FS to underestimate the number of people who

Creating a positive future for off-highway vehicle recreation

participate in this activity and a general lack of willingness to provide high quality and an adequate quantity of opportunities to meet the needs of this very large segment of the population.

Denying access for this segment of the population to existing opportunities has a direct and measurable negative effect on their quality of life. While closing areas to motorized use may enhance the experience of non-motorized recreationists (an increase in quality of life), leaving the areas open to motorized use only requires them to tolerate an existing condition, which results in no change in their quality of life. We believe that the non-motorized community is being asked to make all of the sacrifices in travel planning. As evidence of this we offer the following: There are currently many non-motorized opportunities and areas in Montana, many shared-use areas in Montana, but only two areas managed for OHV recreational access. Both areas are BLM areas in the eastern part of the state and are both smaller than 1000 acres each. Motorized recreationists are forced into smaller areas and their quality of life continues to decline as more restrictions are layered on, yet non-motorized recreationists quality of life improves or, worst case scenario, stays the same.

The proposed trail closures will have little effect on the actual quality of non-motorized experiences because of the incredibly low number of encounters with other recreationists that occur. The closures only satisfy the John Muir philosophy of "protecting the area from human influences" and are detrimental to the vast majority of the citizens who currently use the areas.

Designating large blocks of non-motorized use amount to the establishment of defacto-wilderness areas. While it is the mandate of the FS to recommend new wilderness areas, none of the areas in the proposal are recommended wilderness and should not be managed as such. It is also the mandate of the FS to manage for multiple-use. Creating wilderness is the domain of Congress alone.

The nature of the existing travel plan already segregates motorized and non-motorized uses during the busiest non-motorized season; hunting season. Most trails in the areas are closed to motorized use during hunting season resulting in a significant portion of the fall riding season in most of the areas being restricted to motorized use.

Cumulative Effects

Motorized visitors are concerned over the significant cumulative loss of many historic travel ways. Motorized visitors are unwilling to compromise any further because of the cumulative loss of motorized access and recreation opportunities that has resulted in the lack of equivalent recreation and access opportunities within public lands.

Motorized visitors have the need for trail systems and areas equal to those available to non-motorized visitors (areas and trails including inter-forest, interstate routes, Continental Divide Trail, Pacific Crest Trail and National Recreation Trails). There are no new opportunities within public lands to make-up for the loss of roads and motorized trails. The future need for motorized recreation and access opportunities will not be met if a substantial number of areas, roads and trails are closed. We request that the loss of motorized recreation and access opportunities due to area closure (motorized travel restricted to designated routes) be adequately addressed in the

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travel plan document and decision-making. The proposed area closures are a significant loss of recreation and access opportunities to motorized visitors.

The lack of consideration of area closures combined with the lack of analysis in other travel management actions has produced a **significant** cumulative impact. NEPA defines **significantly** in 40CFR 1508.27. "*Whether a project is significant depends on both the project's context and its intensity. Id. A project's intensity will be evaluated on various factors, three of which are relevant: 1) 'the degree to which the effects on the quality of the human environment are likely to be highly controversial', id. 1508.27(b)(4); 2) 'the degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks,' id. 1508.27(b)(5); and 3) 'whether the action is related to other actions with individually insignificant but cumulatively significant impacts,' id. 1508.27(b)(7).* (Opinion US court of Appeals for the Ninth Circuit, Native Ecosystems Council, v. US Forest Service, Helena National Forest, Region 1. No. 04-35274, filed Nov 7, 2005) We request adequate consideration of impacts from area closures to motorized visitors, winter and summer, in the Little Belt Mountains and the cumulative impact of all area closures throughout Region 1. The document must consider: Where will displaced motorized visitors go? Due to the lack of any reasonable motorized access and recreation opportunities, what will they do?

We request that the impacts associated with the *significant* cumulative loss of motorized recreation and access opportunities be adequately addressed in the environmental document and decision-making.

Past actions have closed many roads and trails to motorized recreation and access without addressing the merits of each specific route/travel way. Justification has included reasons such as non-system roads or trails, ghost roads, user created roads etc. that are not site specific and do not provide adequate justification. The fact is that many roads and trails in use today have been created by visitors going back to the early days of history when all public lands were "open" to motorized access with them appearing and disappearing on USFS maps. Agencies cannot select which roads are useful to keep and which are not without a site-specific analysis. The cumulative effect of not analyzing specific segments is tremendous.

Non-system roads and trails are a significant OHV recreation resource. However, non-system roads and trails are often not inventoried and considered in the travel management process. Failing to identify and consider all non-system routes in the travel management process will under-estimate the existing use and needs of motorized recreationists. The impact that the closure of non-system roads and trails by non-consideration has had on motorized recreationists has been under-estimated. We request that adequate consideration be given to the comprehensive inventory of routes that have been mapped and analysis of the current recreational opportunity that they provide to motorized recreationists.

Wildlife

It appears that several areas in the proposal, most notably the Middle Fork of the Judith Area and the area that borders private lands between Haymaker and Daisy Creek, would restrict OHV use between September 1 and December 1 each year. The areas closed as of October 15 in the existing plan. Again, because of the lack of information available regarding the proposal we

Creating a positive future for off-highway vehicle recreation

have been told that the justification for the closures is to keep Elk on the forest for hunting season. We strongly disagree with this approach.

OHV recreation has little effect on elk movement. If OHV activity is the cause of movement of elk out of these areas then why do they stay in the areas until September while the bulk of the OHV recreational use takes place in July and August? The answer is simple – hunting pressure. It is critical that the FS acknowledge that bow-hunting and OHV recreation are two separate and distinctly different activities. And while many bow-hunters may use OHVs for access, the effect of the OHV use is minimal provided the hunter complies with current rules requiring them to stay on the trails. If the desire of the agency is to keep the herd on public land during the fall season so rifle hunters can be successful, then the management step taken should be to restrict bow hunting, not recreational trail riding of OHVs, which have little or no effect on Elk migration to public land.

It appears that currently the condition that exists is that there are too many elk in the Little Belt Mountains. If the goal is to increase hunters success rates the FS and FW&P should work with land owners to allow hunts on the private lands. This would push the elk back to public land and away from the easy forage and security of the private lands. The herd is habituated to the access to forage and security of private lands and restricting recreational ATV and trail bike use during the fall will do absolutely nothing to correct this scenario. The result of the proposal will be a negative impact on the quality of life for OHV recreationists and no improvement in the elk kill rate.

The wildlife sections of many travel plan documents tend to promote two underlying themes; (1) wildlife and forest visitors cannot coexist, and (2) there are significant negative impacts to wildlife from visitors to the forest. Observations of wildlife in Yellowstone and Glacier National Parks and the 400 deer that live within the Helena city limits combined with common sense tell us that wildlife can flourish with millions of visitors and motorized vehicles.

“Present day populations of white-tailed deer and elk are at their highest levels recorded in recent history” (Montana Wolf Conservation and Management Planning Document, Montana Fish, Wildlife and Parks, January 2000. <http://www.fwp.state.mt.us/wildthings/wolf/wolfmanagement011602.pdf>) Additionally, the number of hunters has leveled off (U.S. Fish and Wildlife Service, 1996 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. http://library.fws.gov/nat_survey_1996.pdf). Therefore, there are no compelling reasons “to elevate the level of elk security in the project area and...enhance elk populations” as frequently suggested by wildlife biologists (example; Fish, Wildlife and Parks letter dated February 27, 2002 to Helena National Forest on the Clancy-Unionville Travel Planning Project, bottom of page 9).

A study of National Park elk habituated to human activity and not hunted were more sensitive to persons afoot than vehicles (Shultz, R.D. and James A. Bailey “Responses of National Park Elk to Human Activity”, Journal of Wildlife Management, v42, 1975). Therefore, hikers disturb elk more than motor vehicles and “disturbance of wildlife” should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife

Creating a positive future for off-highway vehicle recreation

disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

A study of the heart rate of elk found that humans walking between 20 to 300 meters from the elk caused them to flee immediately 41% of the time while an OHV passing within 15 to 400 meters of the elk caused them to flee 8% of the time (Ward, A. L. and J. J. Cupal. 1976. Telemetered heart rate of three elk as affected by activity and human disturbance. USDA Forest Service, Rocky Mountain Forest and Range Experiment Station. Laramie, WY. 9 pp.). Therefore, hikers disturb elk more than motor vehicles and “disturbance of wildlife” should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

A study of mule deer found that 80% fled in reaction to encounters with persons afoot while only 24% fled due to encounters with snowmobiles (David J. Freddy, Whitcomb M. Bronaugh, Martin C. Fowler, “Responses of Mule Deer to Persons Afoot and Snowmobiles”, Wildlife Society Bulletin, 1986). Therefore, hikers disturb deer more than motor vehicles and “disturbance of wildlife” should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

Our combined observations over decades of trail riding have established that significant wildlife mortality does not result from OHV activity. We are not aware of any reports of large animals such as deer, elk, or bear being hit or injured by OHV activity. Additionally, it is extremely rare for OHVs to injure any small animals such as squirrels or chipmunks. We request that wildlife mortality from OHV activity be considered minor and that wildlife mortality not be used as a reason to close roads and trails to OHV visitors.

NEPA

Instead of a process to eliminate motorized access and recreation opportunities, the travel management process should be directed to meet the need for multiple-use, motorized access and motorized recreation on public lands. NEPA requires that agencies “Rigorously explore and objectively evaluate all reasonable alternatives” and must explain why it has eliminated an alternative from detailed study, [40 CFR 1502.14(a)]. We ask that you develop a preferred alternative that preserves and enhances multiple-use interests and motorized recreation.

The over-arching intent of NEPA was not to restrict humans from the natural environment as proposed by some. Instead, the intent of NEPA was to provide for a practical and reasonable protection of the natural environment while providing for a wide sharing of life’s amenities. Note that NEPA specifically used the word “sharing”. Sharing can only be accomplished by managing public land for multiple uses.

Many motorized recreationists, who traditionally recreates in the Little Belt Mountains, may not participate in a formal NEPA process. The process is both time consuming and confusing. Multiple-use interests oftentimes struggle to provide participants due to many other time commitments. At the same time, non-motorized groups, well funded by foundations, have

Creating a positive future for off-highway vehicle recreation

organized, trained and experienced paid staffers that are readily available to participate in the NEPA process and collaborative sessions. These groups are able to participate on a wide front of actions from travel management to timber sales to non-motorized designations. The magnitude of foundation funding available to non-motorized groups tends to amplify their limited-use interests in comparison to the needs of the public. This setting often results in non-motorized interests getting undue benefits by creating and manipulating the process. This setting is not based on the principles of addressing public need and technical merit. We ask that the effectiveness and impact of foundation-funded organizations versus the needs of all citizens be evaluated and factored into the Jefferson Division travel planning process.

Any significant closures of motorized routes and/or areas in the Jefferson Division does not meet the basic requirement of the NEPA act of 1969 as stated in “Sec. 101 (b) (5) *achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities*”. High standards of living and a wide sharing of life’s amenities should include recognizing and meeting the need for motorized access and recreation opportunities in the Jefferson Division area. All visitors should be expected to share the area with others and to tolerate the presence of others. We meet very few hikers and have not perceived any problems with the non-motorized visitors that we have met. We ask that the analysis and decision-making be based on sharing and tolerance and to avoid unreasonable accommodation of visitors to public lands that are not reasonably tolerant and sharing.

The intent of National Environmental Policy Act (NEPA) when seeking comments during scoping and document comment processes is to solicit input in order to assure that significant issues were brought forward and considered. This intent is stated in NEPA Section 1501.7 as “*There shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.*” And in NEPA Section 1503.1 as “(4) *Request comments from the public, affirmatively soliciting comments from those persons or organizations who may be interested or affected.*”

Clearly, comments under NEPA were intended to bring issues and concerns to the attention of the team preparing the environmental document and the decision-makers. NEPA did not suggest that comments were to be used as a voting process to indicate support of alternatives. Nor did NEPA anticipate that the scoping and citizen input would be dominated by well-funded special interest groups. And finally, NEPA did not intend citizens to comment on every possible NEPA as a requirement to protect their interests, needs, and quality of life.

Unfortunately, the comment process has at times been considered a voting process to gauge communal opinion and agencies have not always recognized their responsibility to adequately address the needs of all citizens. This misuse of comments has resulted in agencies overlooking the needs of all citizens and decisions have been made that do not adequately address the needs of the public. NEPA requires decision-making that adequately addresses the needs of all members of the public. This direction was stated in Title 1, Sec. 101 of NEPA Policy Act of 1969 as “*achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities...*”. Under NEPA, decision-makers have a responsibility to seek out, determine, and make decisions that address the needs of all citizens and not just those that submit comments.

Creating a positive future for off-highway vehicle recreation

The needs of all the people are best met by management of public lands and programs for multiple-uses. Motorized roads and trails are a significant source of recreation for all of the public. The public expects decision-makers to adequately protect the existing standards of living and opportunities (human environment) in their decisions. NEPA did not intend for citizens who do not comment on NEPA actions to give up their standard of living to those that do. We ask that public comments not be used as a voting process and that the needs of all citizens be fairly addressed in the document and decision-making

Site Specific Comments

Deep Creek Area

We strongly oppose the designation of the Deep Creek area as a non-motorized area for a variety of reasons:

- The area is the best single track loop system for trail bikes in the Little Belt Mountains and has been used for that purpose for 60 years.
- The topography of the area makes it a difficult area to hike or ride horse-back because of the long distances between water sources and the extreme elevation changes required to make loops.
- Designating over 75 miles of trail in the area would not accomplish your goal of providing non-motorized loops. It would stop all use because of the difficulties mentioned above.
- The soil conditions are very dry, decomposed volcanic soils, which make them very durable and easy to maintain under OHV use and reduces the impact of sediment on fisheries.
- The area was recommended for designation as a "National Recreation Area" by Senator Baucus and Senator Burns in 1991. Both were in favor of protecting the recreational and resource values of the area while maintaining motorized access, a position supported by the delegation today. (see attached letter)
- The Back Country Horsemen do not support closing the area to motorized use because nearly all of the trail maintenance is completed by the Great Falls Trail Bike Riders Association.
- Trail work completed in the area by the MCC has been funded with Montana OHV grant monies.

Trail 343 from its junction with Trail 351 to the trailhead on Divide Road must remain open to trail bikes because it is a critical link for a moderately challenging loop utilizing Pilgrim Creek, Balsinger Creek, and Taylor Hills. Riding Tobens Gulch, Pilgrim Creek, Balsinger and Taylor Hills is a very popular and important route. Without Trail 343, the only option for utilizing the Tenderfoot drainage is to ride the road to Taylor Hills, go down Taylor Hills and follow the Tenderfoot to Daisy Springs Road and take Daisy to Monument Peak. It makes the route much longer and is a very challenging route only suitable for expert riders.

The Fisher Creek, Rugby Creek and the connector trail between them and continuing on to Taylor Hills are very popular trail bike trails and we support adding them to the system.

Trails 732, 735, and 729 in the Hoover Creek drainage should remain open to trail bikes. The routes are important loop trails for trail bikes and have been used for 50 years. While there are

Creating a positive future for off-highway vehicle recreation

many creek crossings on the trails and there is no doubt a negative impact on the cutthroat trout population, we believe the proposed action is not the solution for the problem. Simply restricting OHV use will not address the T&E issues because the horse traffic would no-doubt increase. Horse traffic in the steam is no less detrimental than OHV use. A better solution to the situation would be to relocate the trail and bridge crossings to mitigate the effects of the trail and allow the current uses.

Trail 422 , Trail 433, and the segment of Trail 409 that connects 422 to 409, should remain open to trail bikes. The trails are an important link that allows riders to connect the Middle Fork of the Judith trails with Ettien Ridge, Hay Canyon, and Dead Horse Creek.

Trail 648 should be open and reconstructed for ATV use to complete a loop with Daisy Creek or Daisy Peak Road. Trail 658 and the lower portion of Trail 609 should be open to trail bikes. The trails were closed on a "temporary emergency order" because of damage on the upper portion of trail 609. The upper portion of the trail should be repaired and the trails reopened.

The Seasonal Closures in the Middle Fork of the Judith and in the area bordering private land between Haymaker and Daisy Creek should begin October 15th rather than September 1. The areas are very popular OHV riding areas in September and early October. In fact, that is the most popular time of the year for recreational trail riders.

The ATV trail south of Elk Peak (no trail number) should remain open. It is a popular loop trail and is the only public access into the south end of the Castle Mountains.

Forest Roads 8815 and 8823 are shown as ATV routes on the proposal. They are also high quality 4x4 routes that need to be open to full size 4x4s and ATVs. The ATV trails should allow 4x4 use or they should be designated as dual-use roads.

It appears there was a fair amount of thought put toward providing more ATV loop opportunities, which we support. However, the loops are not connected to each other and don't for a loop trail system. By linking the loops together, the FS could establish a "world class" ATV trail system.

Winter Proposal

Inventories Roadless Areas:

The 'large blocks' proposed as non-motorized in the winter proposal came from an agreement negotiated and facilitated by MWA, without fair representation of the public. Support for this agreement is slim among snowmobilers. This was not a fair, public discussion of winter travel issues. The public was not aware of the negotiation and not invited to participate. This process did not meet NEPA Section 1501.7 "*There shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.*" or as in NEPA Section 1503.1 "*(4) Request comments from the public, affirmatively soliciting comments from those persons or organizations who may be interested or affected.*"

Creating a positive future for off-highway vehicle recreation

The agreement from this process became the 'proposal' released by the US Forest Service, with support of the participants. The 'proposal' map released set expectations and fears that this would be advanced as the preferred alternative. The public has been put at a disadvantage and is now left to defend the current management that has been in place and provided many thousands of hours of enjoyment to families and individuals from areas surrounding the Little Belt Mountains.

These inventories roadless areas have been used by snowmobiles since the mid 1960's. The use has been limited by lack of snow for the past 10+/- years. Specific areas: Logging Creek, Deep Creek, Monument Peak, Dry Fork/Hughsville, as well as the Middle Fork area. Natural terrain also sets limits. The opportunity to snowmobile a specific area when there is snow should not be eliminated. Large block closure to motorized winter use is unfair to future winter recreationists. The number of recreationists using snowmobiles continues to increase, creating a need for more area for dispersed recreation. Once an area is closed, the decision will not be rescinded, regardless of the established need.

MTVRA and GFTBRA are committed to protecting open areas for snowmobiling for future generations. If an open area is found to have a concern at some time in the future, the agency has the authority to take necessary action at that specific time. The future mode of motorized travel may change in ways that are not imagined. We must think outside of the box when making decisions that will affect motorized recreation for many years into the future.

Area restrictions or a designated corridor for winter use for valid resource or wildlife concerns can be supported. We do not support large block area closures creating defacto wilderness area. Wilderness designation is the responsibility of Congress and should not be taken lightly.

MiddleFork Wilderness Study Area Closure:

We do not support the closure of the Wilderness Study Area. The decision issued in 9th Circuit Court addressing the continued use of motorized recreation should take precedent over the interim closure from this agreement.

Wilderness Study Area management has been addressed by the US District Court, May 20, 2001 decision by Judge Donald Molloy. The decision document states: "*the House Report considered and accepted continuing use of off-road vehicles in the nine areas*" and "*it is the intention of the committee that the areas in S.393 remain open to off-road vehicle use unless and until they are formally designated as wilderness.*" And: "***Whether Congress acts tomorrow or years from now or never, the 1977 Montana Wilderness Act requires that the nature, quality and scope of experiences supported by the Wilderness Study Areas shall be maintained, awaiting Congress' decision.***"

The motorized community spent in excess of \$40,000 on this case and the USFS legal costs are unknown but must be in excess of this amount. Snowmobiles have been used in all areas of Montana since the mid 1960's, and motorcycles were used since the 1950's. Our estimate is 80% of the summer motorized recreationists snowmobile and this could easily be higher. The winter proposal adversely affects our members.

Creating a positive future for off-highway vehicle recreation

Interim Closures: Mizpah, Deadman, Jefferson Creek, Silver Crest

The boundary on these areas should be adjusted to natural barriers, thus creating realistic and enforceable non motorized areas. We would suggest that topo maps be provided for these areas with the boundary information. It is extremely difficult to know the actual intended boundary as drawn on the proposal map. The boundaries were set by a few people sitting around a table, using a flat map and drawing lines. We do not believe the snowmobile public received fair and equal representation.

In closing, we would like to thank you for your willingness to listen to our comments. We would encourage the ID team to consider creating alternatives that are fair and equitable to the motorized community. With a fair and equitable proposal, compliance will be accepted and enforcement will not be a problem.

Sincerely,



Russ Ehnes, President

Attachments

CC: Senator Conrad Burns
Senator Max Baucus
Representative Dennis Rehberg

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Check the [outfitters](#) section for everything from dog sledding, to fishing, to picnicking.

Before embarking on any winter adventure, be sure to check the [avalanche center](#) for current conditions.

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PO Box 602 Great Falls, MT 59403
November 23, 2005

Spike Thompson, Supervisor
Lewis & Clark National Forest
PO Box 869
Great Falls, MT 59403-0869

Dear Spike,

These comments are being provided to you on behalf of the Montana Trail Vehicle Riders Association (MTVRA) and the Great Falls Trail Bike Riders Association (GFTBRA) and are in regards to the Summer and Winter Travel Plan Proposals for the Jefferson Division of the Lewis and Clark National Forest.

GENERAL COMMENTS

The GFTBRA would ask that you consider the scoping comments submitted October 25, 2000. A copy of this document along with pictures of use in the WSA over the years was given to Allen Rowley in the spring of 2005. If these documents are not available to you, we would be happy to supply them again upon request.

The proposal you have presented the public was in the form of a map only, with virtually no supporting documentation. The lack of information made it difficult to comment on many aspects of the proposal because there was no way for the public to know what the rationale for site specific changes might be. The only way to obtain information was to inquire at the open-house meetings from Forest Service (FS) staff or call the district offices. In many instances we were told by staff that the information we received from them was "speculation or their assumptions" and that they didn't have any documentation to support their comments either. We suggest that the maps are updated showing the trails that are available for non-motorized use. This deficiency has created the comment there are only 39 miles available. The enclosed page from the Judith Restoration Project shows 20 miles of motorized abandoned in the WSA alone.

We are also concerned that the inventoried, unclassified routes that are present on earlier maps produced by the FS were not addressed in the proposal. When we asked about the trails that we inventoried but did not show up on the map we were told that "if it doesn't show on the map, assume we proposed to close it". Both the MTVRA and GFTBRA supported the Three State OHV EIS, and the newly released OHV Rule, which call for an inventory of existing routes and analysis of those routes. It is unclear to us, based on the information we've been presented, that these routes have been analyzed.

The Three State OHV Decision allows for camping within 300 feet of a road or trail provided recreationists use the most direct route and select their site by non-motorized means. Many times riders going fishing or hunting a particular area feel secure in parking their vehicle off the trail in an inconspicuous spot. Under the current conditions, people are unsure of being legal by parking out of the way. Parking a vehicle on the side of the trail and walking away would leave the vehicle vulnerable to vandalism or theft. We would ask that considering the camping allowance, the provision be added for the parking of OHV's off the trail within a designated number of feet.

The Jefferson Division, especially the Little Belt Mountain Range, serve as the primary source of high quality OHV loop opportunities, with enough quantity to satisfy OHV users needs, within a reasonable driving distance for many Montana communities including Great Falls, Belt, Stanford, Geysler, Judith Gap, Hobson, Lewistown, Grass Range, Harlowton, Cascade, Billings, Livingston, and Laurel. In addition, as a result of restrictions in the Helena National Forest and the Gallatin National Forest many riders from Helena and Bozeman travel to the Little Belt Mountains because of the high quality single track motorcycle trail system. Not only are OHV users coming to the Little Belt Mountains, it appears as though they are being encouraged to seek OHV opportunities on the L&C NF. Evidence of this can be seen on the Gallatin NF web site where the recreation page mentions fishing, hiking, cross-country skiing, other skiing, and snowmobiling but does not mention OHVs. However, the page does direct the user to "check the Lewis and Clark National Forest for more recreational opportunities." (see attached)

The areas have been used by Montana families who have enjoyed motorized access on these lands for as long as 60 years. Several of these families are in the fourth generation of motorized users. In addition, the majority of the trail maintenance in the Little Belt Mountains is done by motorized volunteers. They have donated thousands of hours in volunteer time. Motorized clubs have worked with agencies to secure nearly \$250,000 in grants to fund trail maintenance.

Access for disabled and senior citizens must be considered. As our population ages, more and more seniors are turning to motorized recreation for their national forest experience. Limiting access to areas to 'non-motorized use only' essentially eliminates our disabled citizens and a large segment of seniors from these areas.

While we understand the need for the existing non-motorized areas, including designated Wilderness areas, we strongly oppose the additional proposed "large blocks" of non-motorized areas created by the proposal in the Deep Creek, Hoover Creek, and Lost Fork of the Judith Areas. There is a need for a balance of motorized and non-motorized opportunities and we believe that the current situation provides a fair balance. Non-motorized opportunities and large blocks of non-motorized areas already exist in the Snowy Mountains, the Highwood Mountains, the Rocky Mountains, and the Crazy Mountains to meet the desire of non-motorized recreationists.

The trail system in the area currently serves the entire recreation community yet there is absolutely no data to quantify the level of use by any segment of the recreation public or justify trail restrictions. Based on comments from the motorcycle and ATV community, horsemen, bicycle riders, and individual hikers we've spoken with, encounters with other trail users are extremely infrequent and nearly always pleasant for all parties. Based on the experiences of our members alone we have to ask these questions: Who are you closing the trails for? What conflicts or circumstances on the ground have lead you to believe that there is sufficient interaction or conflict between motorized and non-motorized users to warrant closures?

The President of the Charlie Russell Back Country Horseman rode over 200 miles in the Little Belts this past season and encountered two trail bikes and no other users. Our members have very similar experiences. He also opposes the closures because he recognizes the value of the volunteer trail maintenance done by the OHV community. He understands that without our efforts the quality of the trails would quickly deteriorate.

Also, the Great Falls Bicycle Club wrote in an e-mail "However, many of our favorite trails will become unridable if trail bikes are not allowed to use them as proposed in the draft plan. Trail bikes clear the deadfall and smooth the trail surface on most of the Little Belt Single track trails we enjoy."

According to a recent Forest service survey, 29% of Montanans participate in OHV activities. We believe there has been a tendency for the FS to underestimate the number of people who participate in this activity and a general lack of willingness to provide high quality and an adequate quantity of opportunities to meet the needs of this very large segment of the population.

Denying access for this segment of the population to existing opportunities has a direct and measurable negative effect on their quality of life. While closing areas to motorized use may enhance the experience of non-motorized recreationists (an increase in quality of life), leaving the areas open to motorized use only requires them to tolerate an existing condition, which results in no change in their quality of life. We believe that the non-motorized community is being asked to make all of the sacrifices in travel planning. As evidence of this we offer the following: There are currently many non-motorized opportunities and areas in Montana, many shared-use areas in Montana, but only two areas managed for OHV recreational access. Both areas are BLM areas in the eastern part of the state and are both smaller than 1000 acres each. Motorized recreationists are forced into smaller areas and their quality of life continues to decline as more restrictions are layered on, yet non-motorized recreationists quality of life improves or, worst case scenario, stays the same.

The proposed trail closures will have little effect on the actual quality of non-motorized experiences because of the incredibly low number of encounters with other recreationists that occur. The closures only satisfy the John Muir philosophy of "protecting the area from human influences" and are detrimental to the vast majority of the citizens who currently use the areas.

Designating large blocks of non-motorized use amount to the establishment of defacto-wilderness areas. While it is the mandate of the FS to recommend new wilderness areas, none of the areas in the proposal are recommended wilderness and should not be managed as such. It is also the mandate of the FS to manage for multiple-use. Creating wilderness is the domain of Congress alone.

The nature of the existing travel plan already segregates motorized and non-motorized uses during the busiest non-motorized season; hunting season. Most trails in the areas are closed to motorized use during hunting season resulting in a significant portion of the fall riding season in most of the areas being restricted to motorized use.

Cumulative Effects

Motorized visitors are concerned over the significant cumulative loss of many historic travel ways. Motorized visitors are unwilling to compromise any further because of the cumulative loss of motorized access and recreation opportunities that has resulted in the lack of equivalent recreation and access opportunities within public lands.

Motorized visitors have the need for trail systems and areas equal to those available to non-motorized visitors (areas and trails including inter-forest, interstate routes, Continental Divide Trail, Pacific Crest Trail and National Recreation Trails). There are no new opportunities within public lands to make-up for the loss of roads and motorized trails. The future need for motorized recreation and access opportunities will not be met if a substantial number of areas, roads and trails are closed. We request that the loss of motorized recreation and access opportunities due to area closure (motorized travel restricted to designated routes) be adequately addressed in the travel plan document and decision-making. The proposed area closures are a significant loss of recreation and access opportunities to motorized visitors.

The lack of consideration of area closures combined with the lack of analysis in other travel management actions has produced a **significant** cumulative impact. NEPA defines **significantly** in 40CFR 1508.27. *“Whether a project is significant depends on both the project’s context and its intensity. Id. A project’s intensity will be evaluated on various factors, three of which are relevant: 1) ‘the degree to which the effects on the quality of the human environment are likely to be highly controversial’, id. 1508.27(b)(4); 2) ‘the degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks,’ id. 1508.27(b)(5); and 3) ‘whether the action is related to other actions with individually insignificant but cumulatively significant impacts,’ id. 1508.27(b)(7).* (Opinion US court of Appeals for the Ninth Circuit, Native Ecosystems Council, v. US Forest Service, Helena National Forest, Region 1. No. 04-35274, filed Nov 7, 2005) We request adequate consideration of impacts from area closures to motorized visitors, winter and summer, in the Little Belt Mountains and the cumulative impact of all area closures throughout Region 1. The document must consider: Where will displaced motorized visitors go? Due to the lack of any reasonable motorized access and recreation opportunities, what will they do?

We request that the impacts associated with the *significant* cumulative loss of motorized recreation and access opportunities be adequately addressed in the environmental document and decision-making.

Past actions have closed many roads and trails to motorized recreation and access without addressing the merits of each specific route/travel way. Justification has included reasons such as non-system roads or trails, ghost roads, user created roads etc. that are not site specific and do not provide adequate justification. The fact is that many roads and trails in use today have been created by visitors going back to the early days of history when all public lands were “open” to motorized access with them appearing and disappearing on USFS maps. Agencies cannot select which roads are useful to keep and which are not without a site-specific analysis. The cumulative effect of not analyzing specific segments is tremendous.

Non-system roads and trails are a significant OHV recreation resource. However, non-system roads and trails are often not inventoried and considered in the travel management process. Failing to identify and consider all non-system routes in the travel management process will under-estimate the existing use and needs of motorized recreationists. The impact that the closure of non-system roads and trails by non-consideration has had on motorized recreationists has been under-estimated. We request that adequate consideration be given to the comprehensive inventory of routes that have been mapped and analysis of the current recreational opportunity that they provide to motorized recreationists.

Wildlife

It appears that several areas in the proposal, most notably the Middle Fork of the Judith Area and the area that borders private lands between Haymaker and Daisy Creek, would restrict OHV use between September 1 and December 1 each year. The areas closed as of October 15 in the existing plan. Again, because of the lack of information available regarding the proposal we have been told that the justification for the closures is to keep Elk on the forest for hunting season. We strongly disagree with this approach.

OHV recreation has little effect on elk movement. If OHV activity is the cause of movement of elk out of these areas then why do they stay in the areas until September while the bulk of the OHV recreational use takes place in July and August? The answer is simple – hunting pressure. It is critical that the FS acknowledge that bow-hunting and OHV recreation are two separate and distinctly different activities. And while many bow-hunters may use OHVs for access, the effect of the OHV use is minimal provided the hunter complies with current rules requiring them to stay on the trails. If the desire of the agency is to keep the herd on public land during the fall season so rifle hunters can be successful, then the management step taken should be to restrict bow hunting, not recreational trail riding of OHVs, which have little or no effect on Elk migration to public land.

It appears that currently the condition that exists is that there are too many elk in the Little Belt Mountains. If the goal is to increase hunters success rates the FS and FW&P should work with land owners to allow hunts on the private lands. This would push the elk back to public land and away from the easy forage and security of the private lands. The herd is habituated to the access to forage and security of private lands and restricting recreational ATV and trail bike use during the fall will do absolutely nothing to correct this scenario. The result of the proposal will be a negative impact on the quality of life for OHV recreationists and no improvement in the elk kill rate.

The wildlife sections of many travel plan documents tend to promote two underlying themes; (1) wildlife and forest visitors cannot coexist, and (2) there are significant negative impacts to wildlife from visitors to the forest. Observations of wildlife in Yellowstone and Glacier National Parks and the 400 deer that live within the Helena city limits combined with common sense tell us that wildlife can flourish with millions of visitors and motorized vehicles.

“Present day populations of white-tailed deer and elk are at their highest levels recorded in recent history” (Montana Wolf Conservation and Management Planning Document, Montana Fish, Wildlife and Parks, January 2000. <http://www.fwp.state.mt.us/wildthings/wolf/wolfmanagement011602.pdf>) Additionally, the number of hunters has leveled off (U.S. Fish and Wildlife Service, 1996 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. http://library.fws.gov/nat_survey_1996.pdf). Therefore, there are no compelling reasons “to elevate the level of elk security in the project area and...enhance elk populations” as frequently suggested by wildlife biologists (example; Fish, Wildlife and Parks letter dated February 27, 2002 to Helena National Forest on the Clancy-Unionville Travel Planning Project, bottom of page 9).

A study of National Park elk habituated to human activity and not hunted were more sensitive to persons afoot than vehicles (Shultz, R.D. and James A. Bailey “Responses of National Park Elk to Human Activity”, *Journal of Wildlife Management*, v42, 1975). Therefore, hikers disturb elk more than motor vehicles and “disturbance of wildlife” should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

A study of the heart rate of elk found that humans walking between 20 to 300 meters from the elk caused them to flee immediately 41% of the time while an OHV passing within 15 to 400 meters of the elk caused them to flee 8% of the time (Ward, A. L. and J. J. Cupal. 1976. Telemetered heart rate of three elk as affected by activity and human disturbance. USDA Forest Service, Rocky Mountain Forest and Range Experiment Station. Laramie, WY. 9 pp.). Therefore, hikers disturb elk more than motor vehicles and “disturbance of wildlife” should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

A study of mule deer found that 80% fled in reaction to encounters with persons afoot while only 24% fled due to encounters with snowmobiles (David J. Freddy, Whitcomb M. Bronaugh, Martin C. Fowler, "Responses of Mule Deer to Persons Afoot and Snowmobiles", Wildlife Society Bulletin, 1986). Therefore, hikers disturb deer more than motor vehicles and "disturbance of wildlife" should not be used as a reason to justify motorized recreation and access closures. Additionally, when there are concerns with wildlife disturbance, restrictions on hikers should be given a greater emphasis than restrictions on motorized visitors.

Our combined observations over decades of trail riding have established that significant wildlife mortality does not result from OHV activity. We are not aware of any reports of large animals such as deer, elk, or bear being hit or injured by OHV activity. Additionally, it is extremely rare for OHVs to injure any small animals such as squirrels or chipmunks. We request that wildlife mortality from OHV activity be considered minor and that wildlife mortality not be used as a reason to close roads and trails to OHV visitors.

NEPA

Instead of a process to eliminate motorized access and recreation opportunities, the travel management process should be directed to meet the need for multiple-use, motorized access and motorized recreation on public lands. NEPA requires that agencies "Rigorously explore and objectively evaluate all reasonable alternatives" and must explain why it has eliminated an alternative from detailed study, [40 CFR 1502.14(a)]. We ask that you develop a preferred alternative that preserves and enhances multiple-use interests and motorized recreation.

The over-arching intent of NEPA was not to restrict humans from the natural environment as proposed by some. Instead, the intent of NEPA was to provide for a practical and reasonable protection of the natural environment while providing for a wide sharing of life's amenities. Note that NEPA specifically used the word "sharing". Sharing can only be accomplished by managing public land for multiple uses.

Many motorized recreationists, who traditionally recreates in the Little Belt Mountains, may not participate in a formal NEPA process. The process is both time consuming and confusing. Multiple-use interests oftentimes struggle to provide participants due to many other time commitments. At the same time, non-motorized groups, well funded by foundations, have organized, trained and experienced paid staffers that are readily available to participate in the NEPA process and collaborative sessions. These groups are able to participate on a wide front of actions from travel management to timber sales to non-motorized designations. The magnitude of foundation funding available to non-motorized groups tends to amplify their limited-use interests in comparison to the needs of the public. This setting often results in non-motorized interests getting undue benefits by creating and manipulating the process. This setting is not based on the principles of addressing public need and technical merit. We ask that the effectiveness and impact of

foundation-funded organizations versus the needs of all citizens be evaluated and factored into the Jefferson Division travel planning process,

Any significant closures of motorized routes and/or areas in the Jefferson Division does not meet the basic requirement of the NEPA act of 1969 as stated in “Sec. 101 (b) (5) *achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities*”. High standards of living and a wide sharing of life’s amenities should include recognizing and meeting the need for motorized access and recreation opportunities in the Jefferson Division area. All visitors should be expected to share the area with others and to tolerate the presence of others. We meet very few hikers and have not perceived any problems with the non-motorized visitors that we have met. We ask that the analysis and decision-making be based on sharing and tolerance and to avoid unreasonable accommodation of visitors to public lands that are not reasonably tolerant and sharing.

The intent of National Environmental Policy Act (NEPA) when seeking comments during scoping and document comment processes is to solicit input in order to assure that significant issues were brought forward and considered. This intent is stated in NEPA Section 1501.7 as “*There shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.*” And in NEPA Section 1503.1 as “*(4) Request comments from the public, affirmatively soliciting comments from those persons or organizations who may be interested or affected.*”

Clearly, comments under NEPA were intended to bring issues and concerns to the attention of the team preparing the environmental document and the decision-makers. NEPA did not suggest that comments were to be used as a voting process to indicate support of alternatives. Nor did NEPA anticipate that the scoping and citizen input would be dominated by well-funded special interest groups. And finally, NEPA did not intend citizens to comment on every possible NEPA as a requirement to protect their interests, needs, and quality of life.

Unfortunately, the comment process has at times been considered a voting process to gauge communal opinion and agencies have not always recognized their responsibility to adequately address the needs of all citizens. This misuse of comments has resulted in agencies overlooking the needs of all citizens and decisions have been made that do not adequately address the needs of the public. NEPA requires decision-making that adequately addresses the needs of all members of the public. This direction was stated in Title 1, Sec. 101 of NEPA Policy Act of 1969 as “*achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities...*”. Under NEPA, decision-makers have a responsibility to seek out, determine, and make decisions that address the needs of all citizens and not just those that submit comments.

The needs of all the people are best met by management of public lands and programs for multiple-uses. Motorized roads and trails are a significant source of recreation for all of

the public. The public expects decision-makers to adequately protect the existing standards of living and opportunities (human environment) in their decisions. NEPA did not intend for citizens who do not comment on NEPA actions to give up their standard of living to those that do. We ask that public comments not be used as a voting process and that the needs of all citizens be fairly addressed in the document and decision-making

Site Specific Comments

Deep Creek Area

We strongly oppose the designation of the Deep Creek area as a non-motorized area for a variety of reasons:

- The area is the best single track loop system for trail bikes in the Little Belt Mountains and has been used for that purpose for 60 years.
- The topography of the area makes it a difficult area to hike or ride horse-back because of the long distances between water sources and the extreme elevation changes required to make loops.
- Designating over 75 miles of trail in the area would not accomplish your goal of providing non-motorized loops. It would stop all use because of the difficulties mentioned above.
- The soil conditions are very dry, decomposed volcanic soils, which make them very durable and easy to maintain under OHV use and reduces the impact of sediment on fisheries.
- The area was recommended for designation as a "National Recreation Area" by Senator Baucus and Senator Burns in 1991. Both were in favor of protecting the recreational and resource values of the area while maintaining motorized access, a position supported by the delegation today. (see attached letter)
- The Back Country Horsemen do not support closing the area to motorized use because nearly all of the trail maintenance is completed by the Great Falls Trail Bike Riders Association.
- Trail work completed in the area by the MCC has been funded with Montana OHV grant monies.

Trail 343 from its junction with Trail 351 to the trailhead on Divide Road must remain open to trail bikes because it is a critical link for a moderately challenging loop utilizing Pilgrim Creek, Balsinger Creek, and Taylor Hills. Riding Tobens Gulch, Pilgrim Creek, Balsinger and Taylor Hills is a very popular and important route. Without Trail 343, the only option for utilizing the Tenderfoot drainage is to ride the road to Taylor Hills, go down Taylor Hills and follow the Tenderfoot to Daisy Springs Road and take Daisy to Monument Peak. It makes the route much longer and is a very challenging route only suitable for expert riders.

The Fisher Creek, Rugby Creek and the connector trail between them and continuing on to Taylor Hills are very popular trail bike trails and we support adding them to the system.

Trails 732, 735, and 729 in the Hoover Creek drainage should remain open to trail bikes. The routes are important loop trails for trail bikes and have been used for 50 years. While there are many creek crossings on the trails and there is no doubt a negative impact on the cutthroat trout population, we believe the proposed action is not the solution for the problem. Simply restricting OHV use will not address the T&E issues because the horse traffic would no-doubt increase. Horse traffic in the stream is no less detrimental than OHV use. A better solution to the situation would be to relocate the trail and bridge crossings to mitigate the effects of the trail and allow the current uses.

Trail 422, Trail 433, and the segment of Trail 409 that connects 422 to 409, should remain open to trail bikes. The trails are an important link that allows riders to connect the Middle Fork of the Judith trails with Ettien Ridge, Hay Canyon, and Dead Horse Creek.

Trail 648 should be open and reconstructed for ATV use to complete a loop with Daisy Creek or Daisy Peak Road. Trail 658 and the lower portion of Trail 609 should be open to trail bikes. The trails were closed on a "temporary emergency order" because of damage on the upper portion of trail 609. The upper portion of the trail should be repaired and the trails reopened.

The Seasonal Closures in the Middle Fork of the Judith and in the area bordering private land between Haymaker and Daisy Creek should begin October 15th rather than September 1. The areas are very popular OHV riding areas in September and early October. In fact, that is the most popular time of the year for recreational trail riders.

The ATV trail south of Elk Peak (no trail number) should remain open. It is a popular loop trail and is the only public access into the south end of the Castle Mountains.

Forest Roads 8815 and 8823 are shown as ATV routes on the proposal. They are also high quality 4x4 routes that need to be open to full size 4x4s and ATVs. The ATV trails should allow 4x4 use or they should be designated as dual-use roads.

It appears there was a fair amount of thought put toward providing more ATV loop opportunities, which we support. However, the loops are not connected to each other and don't for a loop trail system. By linking the loops together, the FS could establish a "world class" ATV trail system.

Winter Proposal

Inventories Roadless Areas:

The 'large blocks' proposed as non-motorized in the winter proposal came from an agreement negotiated and facilitated by MWA, without fair representation of the public. Support for this agreement is slim among snowmobilers. This was not a fair, public discussion of winter travel issues. The public was not aware of the negotiation and not invited to participate. This process did not meet NEPA Section 1501.7 "*There shall be*

an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action,” or as in NEPA Section 1503.1 “(4) Request comments from the public, affirmatively soliciting comments from those persons or organizations who may be interested or affected.”

The agreement from this process became the ‘proposal’ released by the US Forest Service, with support of the participants. The ‘proposal’ map released set expectations and fears that this would be advanced as the preferred alternative. The public has been put at a disadvantage and is now left to defend the current management that has been in place and provided many thousands of hours of enjoyment to families and individuals from areas surrounding the Little Belt Mountains.

These inventories roadless areas have been used by snowmobiles since the mid 1960’s. The use has been limited by lack of snow for the past 10+/- years. Specific areas: Logging Creek, Deep Creek, Monument Peak, Dry Fork/Hughsville, as well as the Middle Fork area. Natural terrain also sets limits. The opportunity to snowmobile a specific area when there is snow should not be eliminated. Large block closure to motorized winter use is unfair to future winter recreationists. The number of recreationists using snowmobiles continues to increase, creating a need for more area for dispersed recreation. Once an area is closed, the decision will not be rescinded, regardless of the established need.

MTVRA and GFTBRA are committed to protecting open areas for snowmobiling for future generations. If an open area is found to have a concern at some time in the future, the agency has the authority to take necessary action at that specific time. The future mode of motorized travel may change in ways that are not imagined. We must think outside of the box when making decisions that will affect motorized recreation for many years into the future.

Area restrictions or a designated corridor for winter use for valid resource or wildlife concerns can be supported. We do not support large block area closures creating defacto wilderness area. Wilderness designation is the responsibility of Congress and should not be taken lightly.

MiddleFork Wilderness Study Area Closure:

We do not support the closure of the Wilderness Study Area. The decision issued in 9th Circuit Court addressing the continued use of motorized recreation should take precedent over the interim closure from this agreement.

Wilderness Study Area management has been addressed by the US District Court, May 20, 2001 decision by Judge Donald Molloy. The decision document states: *“the House Report considered and accepted continuing use of off-road vehicles in the nine areas”* and *“it is the intention of the committee that the areas in S.393 remain open to off-road vehicle use unless and until they are formally designated as wilderness.”* And: *“Whether Congress acts tomorrow or years from now or never, the 1977 Montana*

Wilderness Act requires that the nature, quality and scope of experiences supported by the Wilderness Study Areas shall be maintained, awaiting Congress' decision."

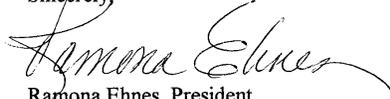
The motorized community spent in excess of \$40,000 on this case and the USFS legal costs are unknown but must be in excess of this amount. Snowmobiles have been used in all areas of Montana since the mid 1960's, and motorcycles were used since the 1950's. Our estimate is 80% of the summer motorized recreationists snowmobile and this could easily be higher. The winter proposal adversely affects our members.

Interim Closures: Mizpah, Deadman, Jefferson Creek, Silver Crest

The boundary on these areas should be adjusted to natural barriers, thus creating realistic and enforceable non motorized areas. We would suggest that topo maps be provided for these areas with the boundary information. It is extremely difficult to know the actual intended boundary as drawn on the proposal map. The boundaries were set by a few people sitting around a table, using a flat map and drawing lines. We do not believe the snowmobile public received fair and equal representation.

In closing, we would like to thank you for your willingness to listen to our comments. We would encourage the ID team to consider creating alternatives that are fair and equitable to the motorized community. With a fair and equitable proposal, compliance will be accepted and enforcement will not be a problem.

Sincerely,



Ramona Ehnes, President

Attachments

CC: Senator Conrad Burns
Senator Max Baucus
Representative Dennis Rehberg

Spike Thompson, Forest Supervisor
P.O. Box 869
Great Falls, MT 59403-0869

October 21, 2005

Dear Mr. Thompson,

I would like to make a few comments regarding the proposed Little Belt travel plan and map that I received in the mail. Just a week after you arrived in Great Falls, two of my riding partners and I met with you and asked you to listen to the users of the forest to help you develop the travel plan. I have also participated in several of the meetings that you have called regarding this issue and have made comments at various points in the development process. I will group my comments about the recently released draft plan into subject areas to help make my points.

MAP: First, the map that I received in my mailing was totally inadequate. I have been riding the trails in the Little Belts for over 30 years and there are dozens of trails that now exist (and some that have been overgrown from disuse) that are not on the map. However, they do appear on previous maps published by the Forest Service. Where did they go? I am not aware of any due process that took them off of the official map, so they should appear on the one you sent out. Some trails (for example Paine Gulch) were open to snowmobiles in the past, but now is listed "Non-motorized use". When did that happen? For you to ask the public to make a decision based upon this map is very unprofessional and unethical. This process should be stopped until you can provide a map that contains all the information needed to make an educated decision.

PROCESS: The process used that resulted in the proposals and map should have had a starting point and an alternative that is the status quo. I am not sure if the status quo was even an option in this process. If one was to begin with the status quo, then one could begin an arbitration process that could result in a plan most could live with. To my knowledge, that was not done.

WILDERNESS STUDY AREAS: The wilderness study areas have grown immensely since this plan started. The Little Belt mountains have not been a wilderness area since the early 1900's. There is ample wilderness in other ranges within driving distance from Great Falls. People seeking the "wilderness experience" can drive to them to get the true experience. The Middle Fork of the Judith and Hoover Creek should be left as is.

TRAIL CLOSURES: Many of the trails have been closed to motorized travel, but remain open to horses. This is tantamount to the federal government supporting a single business entity (outfitters) at the expense of others. Isn't that illegal? The Middle Fork of the Judith is being closed to ATV's but open to motorcycles. Many of the trails there can accommodate ATV's also. Why is this being restricted? Seasonal closures have also changed in this plan. For instance, the trails in the Middle Fork of the Judith, Lost Fork and the southern end of the Little Belts will now close on September 1 instead of the usual October 15th. I'm sure that ATV and motorcycle use is not the reason. Why then? The

Hoover drainage should remain open to motorized travel. If the current level of use is threatening the cutthroat population, then the trails should be closed to **all** traffic and the trails rerouted to avoid stream crossings. Eliminating one form of recreation and not others will not solve the problem.

ATV & MOTORCYCLE TRAILS: Motorcycle and ATV trails should, wherever possible, be loops. You have a few in the proposed plan, but there are many that could easily be extended to become loops. For example trails 343, 422, 433, 344 and 345 (near Monument Peak) and some of the dead end trails near the Holiday Camp trailhead. We were also told that trail 740 from the Jefferson drainage up to the ridge to Big Baldy would be extended for ATV's all the way to the Dry Wolf Campground. The map has it only open to motorcycles. What happened? Making loops out of as many trails as possible will reduce the stress and traffic on the trails, reducing maintenance and increasing the quality of the recreational experience. Overall, the ATV and motorcycle trails are being unfairly reduced and these recreational users are being forced into smaller and smaller areas. Increasing the density of users in these areas will stress the trail system and result in damage to what trails they can ride on. This will force you to shut down trails and further restrict the use of the forest by motorized users. If this is your insidious game plan, you are not carrying out your responsibility as a forest supervisor to support multiple use and to maintain the quality of our forests.

As I said before, my friends and I met with you just after you arrived and discussed many of the very issues I have had to bring up in this letter. I left our meeting that day thinking we had a Forest Supervisor that would listen to all sides and make decisions that were fair and based on good, accurate information. I am very disappointed in this plan and I must conclude from it that what you told us in our meeting was not truthful. Let's scrap this plan and start over – it's bad forest management.



Steven R. Sem
411 Sweetgrass Court
Great Falls, MY 59405
(406) 454-2020

cc: Gail Kimbell, Regional Forester
Senator Max Baucus
Senator Conrad Burns
Representative Denny Rehberg

Doug Poehls
P.O. Box 156
Laurel, MT. 59044

November 22, 2005

Forest Supervisor Leslie W. Thompson
Lewis And Clark National Forest
P.O. Box 869
Great Falls, MT. 59403

Little Belt/Castle/Crazy Mtn. Travel Mgmt.

First let me thank you for the extension of the comment period. I would not have been able to meet the first deadline because of personal and professional commitments. Almost didn't make this deadline for the same reasons.

The Little Belt Mtns. hold a very special place in my life. It was in the Haymaker Canyon area that my children learned how to ride motorcycles. And many weekends over the last thirty years have been spent exploring and enjoying the trails in the Little Belts and Castle Mtns. I am looking forward to showing my grandson this area. Please maintain this area for motorized recreation.

May comments will be mostly concerning the south side of the Little Belts. This area is where I have done most of my riding. I agree with most of what is proposed for this area except in a few places as follows:

Trail # 648 – This short trail from the intersection of trail# 658 and 7 to where 648 meets trail 4 needs to be opened , rerouted (which is easy) and built to accommodate ATV's. The reason for this is to provide easier and shorter access between Daisy Dean and the Basin / Spring Creek area.

Trail # 440 and Trail # 439 – Dead Horse Creek – This trail should not be opened to ATV's. It is currently an excellent single track trail that is pretty technical and great for motorcycles. It would be one of the few single tracks on the south side of the Belts. I rode this in September of 2005. It would require way to much work to be an ATV trail. Swamp mitigation at the top (where motorcycles could be routed in the trees) and a very narrow trail with large rocks on the lower end, that motorcycles can work through but would need to be widened for ATV's. The problem is the creek on one side and a steep hill on the other. Plus throw in some side hills and you can see that this trail should remain single track.

Now to one of the more important issues on this travel plan. In the wilderness study area (which should be abolished) you have left no access to get from north to the south side of the trail systems. You need to include Trail # 433 and Trail # 422 open to motorcycles. These trails are used as major motorcycle routes now to get back and forth from the north and south sides of the trail systems. To make a good loop system you also need to either open Trail # 409 or work a deal with the private landowners on Trail # 437 to allow public access so that trail could be

opened. According to your current proposal those landowners will need to be willing to walk into there property. These trails need to be opened to maintain a good loop system. One concern is that if these transfer trails are not opened you will be forcing riders onto high speed gravel roads to get between the north and south trail systems. Then you will have the problem of motorcycles traveling at 60 to 70 mph and trucks and trailers traveling at 40 mph on the same roads. Plus are you going to allow the motorcycle riders to stash gas because by having to go around this area, we will be exceeding the mileage of our gas tanks.

I ride this area on Labor Day weekend 2005. We had a great ride from lower Whitetail Campground to Holiday Camp down the Judith to Woodchopper. Then we went up Woodchopper and over to Sandpoint and then back to Holiday Camp and Hunter Springs. All of us ended up on reserve going back down to Lower Whitetail. But by following that trip on the map you can see why we need trail loops and the ability to get between the north and south sides of this trail system.

I belong to several organizations – MTVRA and Rimrock Trailriders – that are very interested in these areas. Please listen closely to the recommendations that come from members of these organizations for ideas on the rest of the Travel Plan area. These are the people like myself that use these National Forest areas. Thank you for considering my comments and please keep our public lands open for multiple use.

Sincerely,

Doug Poehls

Forest Supervisor
PO Box 869
Great Falls, MT 59403-0869

Tom Parker
4728 North Woodhaven Way
Billings, MT 59106
(406) 652-3942
E- Mail pjayco1@aol.com

I have been using the Lewis and Clark Forest Service lands for the past fifty years and in that time have enjoyed the following activities: hiking, camping, hunting, fishing, four by four travel, snowmobile, ATV, motorcycle, cross country skiing, and snow shoeing. I am now retired and one year from social security so many of the activities I once enjoyed now have to be scaled back some and motorized travel is becoming more of my way of using Forest Service lands. Therefore, I fully support access and equal opportunities for the elderly and disabled Americans to recreate on public lands. I feel that the Forest Service should maintain existing access to our public lands for both current and future generations. Currently there are large blocks of non-motorized areas available in the Highwoods, Snowies, and the Crazies so the Little Belts should continue to serve as a premier motorized area.

As OHV usage is a year-round activity and not just July and August, many of the seasonal closures need to be changed to Oct. 15th rather than Sept. 1st. Seasonal closures in general should be determined by the Forest Service at the district level and by state officials, with input from the public, rather than becoming a part of the travel plan. After the plan becomes a part of the Congressional Record they are next to impossible to change. This change would make it possible for the Forest Service, the State of Montana, and the public at large to make seasonal closure changes as needed and not have to address a whole new plan. During hunting season game

retrieval using motorized means in areas that have seasonal closures should be allowed during a portion of the hunting day.

Under the scoping process proposed plan, many roads are to be either closed to pickup traffic or come under seasonal closures so that unlicensed drivers and unlicensed machines are able to travel these routes. As the biggest share of these roads are only able to be used at slow speeds they should be designated as being for mixed traffic whereas everyone can still enjoy them. Recommend to the Forest Service that all roads and trails be numbered and in the future a system be developed for rating them for difficulty.

The proposed restrictions on snowmobiling in all of the Lewis and Clark travel plan mountain ranges are not only excessive but unfounded and needs more study. I have heard that these areas are to be closed for snowmobiling so more quiet areas are available for cross country skiing and snow shoeing. Having had much past experience in both these recreation endeavors I can honestly say most of the proposed allotted acreage will not be used. I also do not believe resource damage as far as the use of snowmobiles should be an issue.

Little Belt Mountains:

1. On the southeast end of the mountain range to include the Robert Creek road, all traffic should be designated for mixed traffic. This will enable unlicensed drivers and machines as well as pickup traffic to use the same roads.
2. Roughlock Trail #478 should be connected to Buffalo Canyon Trail # 479 and maintained for ATV and motorcycle traffic. Within Buffalo Canyon there is a phenomenon of nature call the Balancing Rock and this will insure public access to this site.
3. Maintain existing trail off the northern end of road, trail #8814, for motorcycle and ATV access to the Twin Sisters, which will give an avenue to the southeastern end of the

Little Belts. This trail has been in existence for many years and is safe for both motorcycles and ATV's causing little or no resource damage.

4. Recommend seasonal closure on Trail #602 Haymaker, be from Oct. 15th to June 30th. Current trail usage of only two months for motorized traffic is not enough, especially when resource damage is not an issue.
5. Recommend Trail # 603A connecting to Trail #603B off Mount High be opened and maintained for both motorcycle and ATV traffic. During the summer, this will make a loop opportunity using Haymaker Trail and during periods of time when Haymaker Trail is under seasonal closure, a route will still be available to reach the southwestern end of the Little Belts.
6. Recommend Trail #477 going to the north of Mount High be connected to the Trail #480 allowing access to Antelope Canyon. Within this canyon there is another phenomenon of nature that being a limestone tunnel that can be driven through, that needs to have access preserved. Connecting these two trails should not present much of a problem.
7. Recommend that trail #621 leaving Daisy Dean Campground be connected to trail #648 then to trail #658 and be opened and maintained for both motorcycle and ATV traffic. This will make a loop trail.
8. Do not agree with the seasonal closures on trails designated 40 on the proposed travel plan. I feel this should be extended to Oct. 15th rather than Sept. 1st. Trails designated 41 on the proposed travel map should reflect a Dec 1st restriction rather than Sept. 1st. Under the 41 proposal it will only allow two months of motorized use in a year and if there are fire restricting conditions, may be closed all year.

Middle Fork Area:

1. Recommend route #437 through the Middle Fork be maintained for mixed traffic. Resource damage in the form

of silt from the many river crossing seems to be a concern but after seeing the amount of silt being deposited by Mother Nature after just one day-long rain storm or from the melting of snow, the amount created by traffic through the river doesn't amount to much at all.

2. Recommend to either maintain existing route through private land or construct a trail for motorcycle and ATV traffic around this area to the Grendah Mountain Trail #429. This is an existing trail and gives access from the east to the western portion of the Forest Service district. This would provide a loop trail through some very beautiful and interesting country.

Castles:

1. Recommend a complete inventorying of all existing roads and trails that are currently used for multiple purposes. Many have been omitted from the current proposed travel map.
2. Recommend Trail #717 from the bottom of the Beartrap to Elks Peak be maintained for both motorcycles and ATV use. By so doing this will create another valuable loop.
3. Recommend existing trail from Elks Peak to Warm Spring Creek be open and maintained to ATV and motorcycle traffic. This trail has been in use for approximately thirty years and is the only access to the southern portion of the Castle Mountains for the public as all other access on that side is through private property.
4. Recommend existing trail from Warm Springs Creek to and including Trail #618 Cottonwood Creek be open and maintained for ATV and motorcycle traffic. This will create a looped trail back to the Elks Peak area.

Crazy Mountains:

1. Do not agree with the excessiveness of the seasonal closures. All trails designated 40 should be extended to Oct.

15th rather than Sept. 1st. Trails designated 41 on the proposed travel map should reflect a Dec. 1st restriction rather than Sept. 1st.

2. Recommend all trails in the east portion that are currently slated for closure under the proposed travel plan remain open and maintained for motorcycle single track use. Again there is more than ample area available for non-motorized use at this time. Because of the type of terrain and how remote this area is it would have very little day hiking or cross country skiing use. This area should also remain open for winter snowmobile use.

I realize funding to the Forest Service is becoming harder to attain with other areas of concern both at home and world-wide drawing off much of the resources available. With this in mind along with wanting to help maintain a good road and trail system I pledge my help along with the Treasure State ATV Club located in Billings to work with the Forest Service to achieve these goals. We will provide manpower hours as well as financial resources to help in not only maintaining but to improve trails and roads within our multi-purpose use areas.



Tom Parker
President
Treasure State ATV

Date:

Forest Supervisor
 PO Box 869
 Great Falls, MT 59403-0869

Peg Parker
 4738 N. Woodhaven Way
 Billings, MT 59106
 652-3943
 P1AYBO7@aol.com

Dear Sir:

I have ridden in the Lewis & Clark Forest for the past twenty plus years. Initially I rode behind my husband on a motorcycle. For the last 10 or so years I have ridden my own ATV. Consequently, I am quite familiar with the area and concurrently am very concerned about the components of the proposed trail plan. As my husband and I within a few months of drawing social security, our goal is to continue to experience this area on our ATVs. Furthermore, we also believe the existing access to these lands should be preserved for future generations, for the elderly and for the disabled Americans.

We generally ride our ATVs all year-round. The proposed seasonal closures are far too restrictive. If a seasonal closure is determined the date should be October 15th instead September 1st. However, most importantly, the date of the seasonal closure should be determined by the district and state Forest Service personnel instead of becoming part of the trail plan, which cannot easily be changed.

At two times the forest service trails and roads are not consistently numbered, which hampers both the reading of the maps and the discussion of the roads. I recommend this scenario be remedied. In

(2)

addition, safety would be enhanced if the trails and roads were rated for difficulty.

For the Castle Mountains, I have several recommendations:

* Trail 717 from the Beartrap to Elks Peak should be left open and maintained for ATV and single track vehicles. This would create a loop trail - the most desired riding scenario!

* The existing trail from Elks Peak to Warm Spring Creek should be maintained and open to ATV & motorcycle traffic.

* The existing trail from Warm Spring Creek to and including Trail 618 Cottonwood Creek be maintained and open to motorcycle and ATV traffic. Again, this would create another looped trail.

* Lastly, the east portion of the Castle should be designated as multiple use and mixed traffic.

I have numerous recommendations for the Crags:

* Seasonal closures:

- all trails designated 40 should have a seasonal closure of October 15th instead of September 1st.

- all trails designated 41 should have a seasonal closure of December 1st instead of the September 1st.

* Trail closures slated for closure in the east portion should remain open and maintained for single track use.

* The current roads should be designated mixed traffic and multiple use.

For the Little Belts, I have the following recommendations:

* Specific trails:

- Rockpile Trail #478 should be connected to trail #479 and maintained for ATV and motorcycle traffic to Buffalo Canyon.

- Maintain the existing trail off the northern end of trail #8814 for motorcycle and ATV to access the Twin Sisters which ~~also~~ also

③

allows a connector to the eastern end of the Belts.

- The seasonal closure for Trail 602 should be October 15 to June 30th.

- Do construct Trail #477 to the existing trail to Antelope Canyon in order to avoid crossing the private lands.

- Construct the Daisy Dean Campground trail 421 to trail 648 onto trail 658 and have open to ATV and motorcycle traffic, making a loop trail ride.

- The proposed route on top of Mount High: Trail 603A to 603B should be maintained for ATV and motorcycle traffic in order to provide access to the lower half of the Little Belts. This is important because of the limited time available for access to this area through Haymaker.

- Pierce Park area road #189 should be designated mixed traffic.

For the Middle Fork area:

* Route 437 should be designated as open to mixed traffic.

- I realize the resources available to the Forest Service have diminished due to the war in Iraq, the damage that resulted from the hurricanes, and other governmental priorities. Land other members of Treasure State ATV Club located in Billings are very willing to provide manpower and financial resources to maintain and improve the roads and trails in the riding area, which should continue to be the premier motorcycle area for the residents of Great Falls, Stanford, Lewistown, Billings, Bigman, Helena, Livingston, and White Sulphur Springs.

Digger Decker

11-12-05

Craig Busch
 4737 S Woodhaven way
 Billings MT 59106
 406 652-5042

I moved to Montana 26 years ago to enjoy the mountains & outdoors. I like to use an ATV for mountain needs & trails.

I hope we can keep existing Access to public lands and develop more trails as other States are doing.

Currently there is large areas of Non motorized areas the Little Belts should continue to open for OHVs year around.

The majority of Forest Service Roads should be Designated mixed traffic.

TR 717 from the boatrap to Elks peak should be left open and maintained for ATV and single track vehicles.

East portion of the castles should be Designated multiple use and mixed traffic.

Existing trails from Elks peak to Warm Spring Creek should be maintained and open to ATV traffic.

Existing trail from Warm Springs Creek to Cottonwood Creek be maintained & open to ATV & motorcycle traffic.

Current roads should be mixed traffic & multiple use ~~etc~~ in the crazies. All trails in the east portion should remain open.

The east end of the Little Belts Roberts Creek Rd should be designated mixed traffic.

Proposed RT on top of Mount High TR 603A to 603B be maintained for ATV & motorcycle traffic. Pierce park area rd 189 designated mixed traffic.

Daisy Dean trail 621 to 648 to 653 open for ATV & motorcycle traffic.

Route 437 in the middle fork area to mixed traffic.

Maintain existing RT thru private land to the western area by Kings Hill, Grandah mountain trail # 429.

Craig Brown

11-17-2005

Forest Supervisor

Robert Busch
 4737 South woodhaven
 Billings, MT 59106
 CB7356@aol.com
 Phone: (406) 652-5044

I have been living in Montana my entire life and have used public lands since I was a child. I have used public lands for enjoyment of outdoors, hunting and motorized use. With already a shortage of ^{motorized} public land in the Billings, Bozeman, Lewistown and Sulphur Springs area I believe it is extremely important to keep these land areas open for not only local use but also to feed off tourism and help community economies rather than damage them.

Also I use OHV year-round and I think seasonal closures should be determined by the Forest Service district and state officials that actually reasearch the land, rather than becoming a part of the travel plan. Most of forest service roads should be designated mixed traffic, helping not only public use but also emergency use.

I have used the Castles for nearly five years for OHV use. I think TR710 from Beartrap to Elks park should be left open and maintained for atv and single track vehicles so that there is a loop trail. Also the trail from the peak to Warm Spring Creek should be maintained and open to atv and motorcycle traffic as well as trail 618 Cottonwood Creek to allow a looped trail. All trails in the East portion slated for closure should be maintained and remain open for motorcycle single track use.

I think Roberts creek road should be for mixed traffic use. Roughlock trail #478 should be connected to trail #479 and maintained for both ATV and motorcycle use. Also that all existing roads be designated for mixed traffic. Trail 603A to 603B should be maintained for ATV and motorcycle traffic. Also the Daisy Dean campground trail 641 to 648 to 658 should be open to ATV and motorcycle traffic to allow for a loop trail.

Route 437 in the Middle Fork area should be designated for mixed traffic and maintain existing route through private land and to the western area by King's Hill, Grotches mountain top, #439. This should be done to allow a loop trail through beautiful country for everyone to enjoy.

Robert Busch 11/15/05

To:
Forest Supervisor
P.O. Box 869
Great Falls, MT 59403-0869

From:
Barb Garritson
1246 Wicks Ln
Billings, MT 59105

I am a native Montanan who has enjoyed the mountain trails for 50 years. I now find that I am unable to hike the trails because of health reasons. My 23 year old son has a disability (MD) that makes it difficult to hike for long distances. We have purchased ATVs in order to get to the mountains.

We encourage you to keep trails open and accessible for people like ourselves who are unable to walk the trails + high mountain roads.

Thank you
Barbara J. Garritson
Nov 17, 2005

GAIL M. NEAL
 4511 Murphy Ave
 Billings, MT 59101
 406-256-5591 gmbneal@earthlink.net

To: Forest Supervisor, P.O. Box 869, Great Falls, MT
 59403-0869

For the past 2 1/2 years I have been riding an ATV. I have enjoyed being able to do this as I have problems liking that have increased with age. I favor keeping the existing trails open in the Belts, the Crazyes and the Little Belts.

I also urge you to review all the trails for numbering and rated for difficulty (I am NOT a seasoned rider).

I encourage you to keep these roads open for persons with disabilities and seniors (like me).

Gail Neal
 11-17-05

Bryan Cook
 239 Tan O'Shanter Rd.
 Billings MT 59105

Trail 429 provides access from
 the east to the western portion
 of the district this would
 maintain a loop trail.

Road to Mount High 603A 603B
 used for ATV + motorcycles

477 Antelope Canyon great
 opportunity to see some great
 country

Trail 621 to 648 and 658 open
 to ATV and motorcycle
 will make a great loop trail.

Middle Fork Area 437 open to
 mixed traffic

Bryan Cook

Bryan Cook
 239 Tim O'Shanter Rd
 Billings MT 59105

Daisy DEAN 621, 2 648, 658
 Open to ATV for a loop
 ride

ROAD 189 mixed traffic

East end Little belts
 Roberts creek be mixed
 traffic

MAINTAIN trail 8814 for
 access to the East end of
 the belts from Jelleison place

SEASONAL CLOSURES ARE TOO
 RESTRICTIVE THE TRAVEL PLAN ~~IS~~
 NOT THE PLACE TO MANAGE WILDLIFE
 IF THE MANAGEMENT PLAN DOES NOT
 WORK IT WILL BE TOO HARD TO CHANGE

TRAIL 478 should be connected
 to 479 for access to BUFFALO
 CANYON
 Bryan Cook

Bryan Cook
239 Tam O'Shanter Rd.
Billings MT 59105

CRAZIES

SEASONAL CLOSURES ARE TO
RESTRICTIVE THE TRAVEL PLAN
IS NOT A GOOD WAY TO MANAGE
WILD LIFE.

CURRENT ROADS SHOULD BE
DESIGNATED MIXED TRAFFIC AND
MULTIPLE USE

TRAILS SHOULD BE INVENTORIED
WE ARE LOSING TRAIL BECAUSE THEY
ARE BEING DROPPED FROM THE MAPS
THIS IS AN UNDER HAND WAY
TO CLOSE TRAIL. COMPARE THE NEW
MAP TO AN OLD MAP AND YOU'LL
SEE WHAT I'M TALKING ABOUT.

Bryan Cook

Forest Supervisor
 PO Box 869
 Great Falls, MT 59403-0869

Andy Hopison 2014 Dickie RD
 252-5496

As an atv rider and avid hunter
 I think you should be able to
 retrieve game with an atv. I also
 would like to see the trails stay
 open until October 15, rather than
 sept. I also I enjoy snowmobiling in
 the little belt mountains and I do not
 agree with the proposed restrictions
 on the proposed trail plan. I think
 more research is needed to determine
 the impact that snow machines
 have on the area. numbered trails
 with difficulty levels would be nice. I have
 no problems sharing the trails with horsemen
 jeps. and pick ups. having used these
 trails for as long as I have had a drivers
 license I have never had a problem with
 another user. as a member of treasure state
 atv club I have no problem with doing
 trail maintenance and or improvements. I
 did not spend thousands of dollars on an atv
 and gear to ride on paved roads in town.
 I enjoy the outdoors and want to continue
 playing in the mountains.

To
 Forest Supervisor
 P.O. Box 867
 Great Falls, Montana 59403-0867

From
 Bob Gantner
 1246 Wicks Lane
 Billings, Mont 59105

Sir,

I am a third generation Montanan and have been spending my recreation time in the forest for all my life which is over a half century.

I do recommend that a complete inventory of all existing trails, roads & routes that have been omitted from the current map.

Access to the forest lands has been a Montana tradition for four generations of my family. The restrictions that are being proposed are unsafe for both the elderly and disabled.

ATVs & snowmobiles are providing access for those and other programs and are now being placed off limits.

*a more reasonable approach needs to be
taken that can benefit all.*

Prof. Gaviter

Cheryl Forrester
2416 Hillmer Lane
Billings, MT 59101

Dear Mr. Thompson,

I'm a lifetime Montana resident who enjoys getting out in our forests to ATV in the summer and fall and snowmobile during the winter months. There are more and more people who have become outdoor recreationist in one form or another. Limiting access to us just doesn't make any sense to me. There are large areas of non-motorized areas available in the Crazyes, Snowies, Highwoods. I fully support access to and equal opportunities for the elderly (which I am not too far from being in this category myself) and disabled Americans to recreate on public lands. Season closures need to be determined by the F.S. district and State not be implemented as part of a travel plan. OHV usage is a year-round activity -- not just July & August. Closures should not be moved up unless extremely wet conditions persist for a given year.

I personally haven't done much riding in the Castles but as other areas get more congested I would like an opportunity to explore that area. Any trails in that area need to be left open to motorcycles & ATV. Loops are always desirable. My husband and I (and when they are here our grandchildren from Florida) enjoy camping and putzing around on the roads and trails in the Little Belts. The East end Roberts Creek area should be mixed traffic as should all existing roads in this area. The Roughlock Trail # 478 should be connected to # 475 and maintained for ATV & MC use to Buffalo Canyon. Road 8815 is a very good road do not close this to open a Youth Loop. The loop has no public support that I have heard of and mixed travel should be in place. Road # 602 & # 476 need to be mixed traffic. Again a Youth Loop is not necessary. The road from Daisy Deer to Daisy Peak must allow mixed traffic there is no other access on this side of the mountain. As I mentioned before we bring our grandchildren here to camp and ride from the Jellison Campground and as they get older I'm sure they will enjoy it even more. At 4 and 5 years of age they

are just becoming involved in the ATV and Snowmobile world. They will never have any opportunity in their home environment in Florida to experience what they have already become to love. Ellison's Place is probably the closest to Billings for us to take our grand children to camp and ride and this past summer they got to see a bear. They dance in our livingroom chanting camping camping camping. Lets not mess with what we have now. Lets just make it better. I am a member of the local state snowmobile clubs, and the local ATV + state MTR A club. I support these organization and we have volunteered to help with clean-up and erosion or what have you on the trails and or roads in these areas. I could go on but I know this is getting long. Please consider me, my friends and family when you make up your draft. Thanks for hearing me out.

Sincerely
Cheryl Forrester

DATE: 11-13-05

LITTLE BELT/CASTLE/CRAZY MOUNTAINS TRAVEL MGMT. PLAN

NAME: (Please Print) Tim Tuss

ADDRESS: P.O. Box 101 Monarch MT 59463

COMMENTS: (What features about the travel plan do you like...or dislike...and explain why.)
If you prefer one route over another, tell us why your preference would be the best course of action.

My comment is that the cross
country skier and snowshoer's all
readly have a place. They do not
use the middle fork area. I really
do not want to see the Sand point
area closed. I have snowmobiled in
this area for over 15 year and not once
seen a cross country skier.

MAIL TO: Forest Supervisor Leslie W. Thompson
Lewis and Clark National Forest
P.O. Box 869
Great Falls, MT 59403

DATE: 10-24-05

LITTLE BELT/CASTLE/CRAZY MOUNTAINS TRAVEL MGMT. PLAN

NAME: (Please Print) STACY J. HILLADDRESS: 1705 1st AVE. N, GREAT FALLS, MT 59401cc Senator Max Baucus, Senator Conrad Burns, Representative Denny Rehberg
COMMENTS: (What features about the travel plan do you like...or dislike...and explain why.)
If you prefer one route over another, tell us why your preference would be the best course of action.

I have been a Montana resident for almost a year now, and
one of the main reasons I moved here was for the opportunities
to enjoy the outdoors. I purchased a dirtbike in February
and have spent many enjoyable hours exploring the
Little Belt mountains. My dirtbike has been a great way
to meet people; in fact, the majority of my new riding
friends are natives of the Great Falls area who love
the area and are responsible outdoor enthusiasts and
stewards of the trail systems around here. To
close the trails to motorized vehicles would be punishing
some of the forest's biggest supporters & protectors.
I have seen more damage personally from horses,
cattle, and even wildlife along the trails and
creek systems. In the times riding around Monarch,
Deep Creek, Logging Creek, and other areas, I have
yet to witness inappropriate or abusive behavior

MAIL TO: Forest Supervisor Leslie W. Thompson
Lewis and Clark National Forest
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Great Falls, MT 59403

in other riders encountered along the trails. There is a long history of riding in these areas, and they're still beautiful areas, worthy of protection and continued enjoyment. The riders will continue to take on that responsibility as they have all these years. As for limiting riding season, the argument was made that OAVs chase elk from the area in September. However, all manage to co-exist throughout the summer. It's far more likely that hunting pressures cause the migration from the area.

Please keep use of the Little Belts open to all recreation interests. It's one of the few areas left where we've managed to make it work for the environment and those who want to enjoy it. I'm an environmental engineer and strongly support the good work that the trail rider's organizations undertake to make sure the environment is protected and that it's accessible for all to enjoy.

Thank you for your time.

Slough Hill

Smey Hill

1705 1st Ave N

Great Falls, MT 59401

To the Forest Supervisor
 PO Box 869
 Great Falls, MT 59403-0869

I am CAROL WASENMILLER and I live
 at 11375 Peaceful Plateau Trail, Box 10
 Shepherd, MT 59079
 My home phone is 406-947-5525
 My email is: floogle@usadig.com

I have been riding ATV's for three years.
 Prior to ATV's I rode horses for 49 years. I
 plan to ride during my last breath on an ATV.

Please, for me and generations that
 will follow me, keep forestry trails open. The
 beauty I have been privileged to see is awesome,
 humbling, & inspiring.

I strongly support access to the public
 lands in the Smokies, Crayes, Little Belts.
 As an older person myself I appreciate the
 ATV access to the beautiful areas.

I personally ride the year round. If
 closures could be delayed to mid October for
 seasonal use our great fall weather can be
 utilized for getting into the outdoors over a
 longer period of time.

Please keep seasonal closures determined
 by the forest service district & our state officials.

The idea of numbering forest service trails and rating them for difficulty would be very helpful. Not all of us have ridden all the trails.

I would encourage more public input be allowed on restrictions placed on snowmobiles. I do ride an older snowmobile and it allows access to the Winter Wonderlands of Montana. There just is too much beauty to disallow public access in snowmobile areas.

I would ask that a complete inventory of all the existing trails, roads, & routes for multiple uses. My understanding is some of the routes are not included on the current travel map.

Trail 717 from the Beartrap to Elks Peak, east portion of the Castles, & the trail from Elks Peak to Warm Spring Creek should all be maintained & left open for multiple use & mixed traffic uses.

Thank you for your consideration!

Cecily Wassmiller

CONCLUSION OF HEARING

Senator BURNS. We appreciate everybody coming today, and we hope it's been somewhat informative. We understand what the challenges are, and we aim to take a look at them. Thank you very much.

[Whereupon, at 12 noon, Friday, December 2, the hearing was concluded, and the subcommittee was recessed, to reconvene subject to the call of the Chair].

