



Greater Yellowstone Coalition

P.O. Box 1874 + Bozeman, Montana 59771 + (406) 586-1593
gyc@greateryellowstone.org + www.greateryellowstone.org

THE GREATER YELLOWSTONE COALITION

STATEMENT FOR THE RECORD

UNITED STATES SENATE SUBCOMMITTEE ON PUBLIC LANDS AND FORESTS

December 17, 2009

CONCERNING:

S. 1470 – Forest Jobs and Recreation Act of 2009

Thank you for the opportunity to offer written testimony for the record.

The Greater Yellowstone Coalition, representing over 13,000 members and supporters from across the country, strongly supports S. 1470, the Forest Jobs and Recreation Act of 2009 and believes that with the changes noted below the bill will provide the most benefits to the people of Montana and the country. As a regional conservation organization, the Coalition's mission is to protect the lands, waters and wildlife of the Greater Yellowstone Ecosystem now and for future generations. The protection, restoration and stewardship of southwest Montana's public lands which will result from this bill's passage will substantially benefit the Greater Yellowstone Ecosystem. Because of their proximity to Yellowstone National Park, these lands are of national significance and critically important to the long-term conservation of the Greater Yellowstone Ecosystem. The bill's passage will benefit the American people as well as future generations by protecting and restoring important habitats that safeguard the region's iconic fish and wildlife.

The people of Montana strongly support of this legislation. The bill has united diverse interests to work together toward better conservation of our public lands. For this reason, the Forest Jobs and Recreation Act enjoys broad, bi-partisan support from across the state.

Conservation Benefits:

This bill will protect and restore Greater Yellowstone's natural heritage. Wilderness designations in Greater Yellowstone – the Snowcrest and Centennial Mountains, Lost Cabin in the Tobacco Roots, the Ruby Mountains, additions to the Lee Metcalf Wilderness, and the Blacktail range – protect some of the last and best unroaded backcountry habitats in the Montana part of the ecosystem. These core habitats are vital to the ecosystem's iconic wildlife. These wilderness areas also protect the headwaters of many of Greater Yellowstone's most famous

rivers, including the Ruby, Missouri, Jefferson, and Madison. Further west, designations in the Pioneers, the Big Hole, Italian and Lima Peaks and Sapphires will protect important linkage habitats, ensuring wide-roaming species continue to disperse across southwest Montana's landscape. Such dispersal is essential for maintaining the long-term genetic viability of sensitive species such as grizzly bears and wolves. The restoration and stewardship projects provided for in the bill will heal lands damaged by past practices, restoring fish passage in cold water streams and reducing road densities that diminish habitat quality for a variety of species. These restoration activities will become increasingly important to ensure our fish and wildlife populations are resilient in the face of a changing climate.

Broad Coalition and collaboration

The Forest Jobs and Recreation Act is the result of three place-based collaborations that brought diverse interests together to solve the challenges confronting Montana's national forests. As a regional conservation organization, focused on only a portion of Montana, the Greater Yellowstone Coalition was not a part of these original collaborations. In July, because of the benefits to the Greater Yellowstone Ecosystem resulting from S. 1470, we joined the coalition supporting this legislation. Our involvement and input has been welcomed by all of the diverse partners. Key components of the bill, particularly the inclusion of the Bureau of Land Management Wilderness Study Areas, reflect the responsiveness of the original collaborations and Senator Tester to our input.

NEPA:

The Greater Yellowstone Coalition and its partners share a common goal of ensuring the stewardship projects resulting for this legislation receive complete, adequate environmental analysis at the landscape scale in full compliance with NEPA. We also support the required "pre-NEPA" collaboration for these projects in order to facilitate improved project design and greater public support for restoration work on the ground.

We believe the language of the bill as introduced needs to be tightened to more clearly achieve these goals. Specifically, clearer language is necessary to ensure a full range of alternatives, including the "no action" alternative, is analyzed, and the bill retains agency authority to decide to not proceed and/or to modify proposed projects based on the environmental analysis, regardless of other directives contained in the bill. This is important to ensure that both the spirit and the letter of NEPA are upheld.

Bill language also needs greater clarity with regard to the triggers of a supplemental environmental analysis. Changed circumstances on the ground (such as a wildfire in part of the watershed undergoing stewardship and restoration work) and/or adaptive management decisions that necessitate changes to the project will clearly require further analysis. The current language of the bill makes supplemental analyses difficult. We agree that implementation of portions of the overall project unaffected by such changes ought to proceed; however the bill currently reads that the entire project would proceed. This language needs to be fixed (Section 102 (6)(C)(ii)(II)) to ensure that work in areas undergoing supplemental analysis would be delayed until the analysis is complete and any necessary modifications made to the project.

Finally, the timeline for producing the necessary EIS and Record of Decision must be achievable so that the analysis is not shortchanged and the decision made unnecessarily legally vulnerable. This may require some modification of the language in Section 102 (b)(1) as well as adequate appropriations to ensure the Forest Service has the staff and resources available to do the necessary environmental analysis effectively.

Wilderness designations:

Approximately 168,000 acres of the 677,000 acres of wilderness proposed in the Forest Jobs and Recreation Act lie within Southwest Montana's portion of the Greater Yellowstone Ecosystem. Places such as the Ruby and Centennial Mountains, the additions to the Lee Metcalf Wilderness and the Snowcrest Range are hidden gems in Greater Yellowstone where Montana families and visitors hunt, fish, hike and camp. These lands provide important wildlife habitat for big game, rare predators and other wildlife that roam across the landscape. In particular, these areas boast some of the state's largest elk herds, longest antelope migrations, and most robust moose populations. Given these wildlife values, it is no surprise that 50 percent of the state's elk harvest comes from this part of Southwest Montana.

Wolverine, grizzly bears and wolves also depend upon these wild lands for core, secure habitat far from roads as well as important linkage habitats that ensure they can roam the landscape. The wild lands protected under S. 1470 which lie beyond the Greater Yellowstone Ecosystem serve as vital stepping stones, keeping Greater Yellowstone connected to central Idaho wildlands and ensuring wildlife can continue to disperse across southwest Montana. Such dispersal and migration is essential for the long-term genetic health of these rare, crucial and vulnerable species. For these reasons, we support all of the wilderness designations contained in the Forest Jobs and Recreation Act as introduced.

We offer the following specific comments regarding several of the proposed wilderness areas of particular importance to the Greater Yellowstone Ecosystem.

Mount Jefferson:

This 4,500 acre proposed wilderness generates passionate attention from many constituents and vocal opposition from snowmobile interests. Mount Jefferson deserves wilderness protection both on its own merits and to protect the integrity of the adjacent BLM Centennial Mountains wilderness, also included in S. 1470. The wilderness boundary as proposed in S. 1470 should remain intact for the following reasons:

1. High conservation value: The Mount Jefferson proposed wilderness includes Hellroaring Creek basin, the farthest and highest headwaters of the Missouri River. Contiguous with the proposed BLM Centennial Mountains wilderness, the two areas combined create almost 30,000 acres of wilderness on the north side of the Centennial Mountains.

Mount Jefferson and the Centennials provide secure habitat for Greater Yellowstone's most valued and iconic wildlife. Moose winter among the sub-alpine fir along Hellroaring Creek. The area provides important security cover for elk in the fall during

big game hunting seasons in both Montana and Idaho. Grizzly bears and wolverine, both icons of wildness that need remote backcountry to survive, use the Hellroaring drainage as important habitat.

As a rare east-west trending mountain range, Mount Jefferson and the Centennial Mountains function as an important linkage between the Greater Yellowstone Ecosystem and the wildlands of central Idaho. Wide-ranging species such as wolves, bears and wolverines use this important corridor. Ensuring this region can still function as a linkage requires protecting large chunks of public land from habitat fragmentation.

2. Montana jobs and economic opportunity:

Locally owned Montana businesses depend upon the quiet recreation opportunities found on the Montana side of the Centennial Mountains. Hellroaring Ski Adventures based in West Yellowstone, operates a backcountry hut and guided ski touring business in the Hellroaring Creek drainage. This is the only such operation in this part of Montana, providing a unique experience for the public on BLM and National Forest lands.

In the summer and fall, Centennial Outfitters, in Lima, MT, offers backcountry pack trips and fishing adventures in the area. Both of these businesses are negatively impacted by increasing snowmobile use on the Montana side of Mount Jefferson. Centennial Outfitters routinely finds broken windshields, oil cans, pieces of rubber, and other debris from snowmobiling. Hellroaring Ski Adventures' clients have experienced direct conflicts with snowmobilers, including noise, while seeking a quiet winter recreational experience. In addition to these outfitters, nearby outdoor shops catering to quiet recreation support wilderness designation for Montana's side of Mount Jefferson.

3. Ensuring a balance of recreational opportunities in Southwest Montana:

In addition to providing refuge for wildlife, Mount Jefferson and the Hellroaring drainage offer outstanding opportunities for quiet recreation in every season. Hunting, fishing, skiing, hiking, camping and horse packing are all popular activities. There is only very limited motorized access from the Montana side of the Centennial Mountains. As a result, Mount Jefferson and the northern Centennials are known as some of the wildest backcountry in Montana, offering solitude and quiet for those seeking a wilderness experience.

With regard to winter recreation specifically, the snowmobiling community's interest in continued access to Montana's portion of Mount Jefferson must be understood in the context of snowmobiling opportunities across the broader landscape. To suggest that closing Montana's side of Mount Jefferson to snowmobiling will negatively impact the economy of communities in Eastern Idaho is inaccurate. In fact, leaving the Montana side of Mount Jefferson open to snowmobiling eliminates one of the few opportunities for quiet, human-powered winter recreationists to escape the din of snow machines.

Analysis of data for public lands within a 20-mile radius of Island Park, Idaho shows that 98 percent of those lands, or 297,933 acres, are currently open to snowmobiles. The

Forest Jobs and Recreation Act, by protecting the entire Hellroaring basin and the Montana side of Mount Jefferson, would reduce this acreage by a mere 2,344 acres, bringing the percentage of public lands open to snowmobiles in the Greater Island Park area to 97 percent. (See Attachments A and B which include maps depicting this analysis).

On a broader scale, of the 3 million total acres on the Caribou-Targhee National Forest, which surrounds Eastern Idaho's communities, nearly 2.5 million acres are open to snowmobiles while just 545,000 acres are protected for non-motorized winter activities. In Montana, on the Beaverhead-Deerlodge National Forest, 2,049,099 acres are open to snowmobiling. Immediately north of the Centennial Mountains, much of the Gravelly Range is open for winter motorized recreation.

Furthermore, the Idaho side of both Mount Jefferson and Rheas Peak will remain open to snowmobiling, offering similar terrain and high marking opportunities in the vicinity of Island Park. (See Attachments C and D which include photos of these peaks).

4. A partial designation will not work:

A decade of experience managing the Hellroaring drainage to protect both wilderness values and to allow snowmobiling access clearly demonstrates that a partial wilderness designation for Mount Jefferson will not work.

Documented illegal snowmobile use in the BLM Centennial Wilderness Study Area led the BLM to repeatedly request that the Forest Service close the Mount Jefferson area to snowmobiles. Since 2001, the Forest Service has partially closed Forest Service lands in the Hellroaring basin to snowmobiles. During the winter, routine agency patrols consistently find evidence of trespass into both the BLM Wilderness Study area and the portion of Forest Service land closed to snowmobiles. Increased signage and patrols, aimed at reducing violations, have met with little success. (See Attachment E which provides photo documentation of snowmobile trespass).

In its final Forest Plan, the Beaverhead-Deerlodge National Forest dropped the southern half of the Mount Jefferson/ Hellroaring area from its list of recommended wilderness, leaving it open to snowmobile access. This decision is topographically unenforceable as the boundary between the open and closed areas runs along an indistinct ridge from the summit of Mount Jefferson. Signing the closed area and enforcement of the boundary will be extremely difficult. Continued violations of the BLM Centennial Wilderness are certain under this partial closure, leading to more conflicts. (Attachment F includes a topographic map of the area).

For Mount Jefferson and the Centennial Mountains, the relevant compromise on land use was struck in 1991. Of the 93,000 acres in the Centennials evaluated for wilderness suitability (including lands in both Idaho and Montana), the BLM recommended 28,000 acres for wilderness designation in Montana — including Mount Jefferson — and released 70 percent of the study area for non-wilderness use. No adjacent lands in Idaho were recommended for wilderness designation.

Snowcrest Mountains

The Snowcrest Mountains proposed wilderness — the largest wilderness included in S. 1470 — represents a unique addition to the National Wilderness System. The Snowcrest Mountains, considered in conjunction with the adjacent Blacktail and Robb Ledford State Game Ranges, provide a large block of secure wildlife habitat at the western edge of the Greater Yellowstone Ecosystem. The Snowcrest Wilderness will protect unique and varied habitat types, including rolling sagebrush hills, whitebark pine stands, aspen, and alpine grasslands. The Snowcrests offer some of the highest quality wolverine habitat in southwest Montana. Wolves, bears, mountain lion and large elk herds roam these remote mountains. Due to the abundance of big game, the Snowcrest Mountains are among the most heavily hunted areas in Montana. Streams on the eastern side of the Snowcrest Mountains feed the famed Ruby River which is noted for both trout and grayling fisheries.

Traditional ranching uses will continue in the Snowcrest Mountains under S. 1470, and specific language in Section 201(n)(3) provides for continued motorized access to maintain existing water impoundments and to trail sheep across the range to summer pasture. We recommend amending the language in Section 201(n)(3)(B) regarding motorized access for trailing sheep to include a sunset provision for this access should the current permittee relinquish their allotments in the future. This will ensure that this non-conforming use can be removed from the Snowcrest Wilderness if the livestock use is no longer occurring.

BLM Wilderness Study Areas:

The Greater Yellowstone Coalition specifically requested that administratively designated Wilderness Study Areas within the Dillon Resource Area be addressed by S. 1470. These island mountain ranges provide important wildlife habitat and connectivity for wide-ranging species that reside in southwest Montana. We strongly support the proposed wilderness designations for portions of the Ruby, Blacktail and Centennial Mountains Wilderness Study Areas managed by the Bureau of Land Management. As wilderness, these lands will continue to function as refugia for critically important wildlife, including wolverine, elk and wolves.

We recommend the committee consider two additions to the BLM lands proposed for wilderness designation within the Forest Jobs and Recreation Act.

1. East Fork of Blacktail Wilderness Study Area: In 1991, the BLM recommended the release of this entire 6,200 acre wilderness study area. At that time, the Forest Service had not recommended the Snowcrest Mountains for wilderness. This WSA sits in the middle of a landscape managed for wilderness and conservation purposes because it is contiguous to the Snowcrest proposed wilderness and adjacent to two Montana Fish, Wildlife and Parks Wildlife Management Areas. This WSA has significant value for the conservation of Greater Yellowstone's wildlife and fisheries, and should be added to the wilderness designations of S. 1470.
2. The Peet Creek/Price Creek parcel, Centennial Mountains: This is the largest of the five parcels released from the BLM Centennial Wilderness Study Area (approximately 3,800

acres). We recommend this parcel be added to the proposed Centennial Mountains Wilderness with a cherry stemmed boundary to accommodate the existing improved logging road in the E. Fork of Peet Creek. This parcel has significant conservation value for big game, wolverine, bears and westslope cutthroat trout. It also enhances the Centennial Mountains wildlife linkage area and connectivity between Greater Yellowstone and Central Idaho.

Forest Management & Stewardship

The Greater Yellowstone Coalition supports the restoration emphasis of S. 1470. Using stewardship contracts to fund road rehabilitation, stream restoration and habitat revitalization will benefit native fish and wildlife. In the southwest Montana portion of Greater Yellowstone, there are areas, such as the West Fork of the Madison River and the southern Tobacco Root Mountains, that would benefit from the stewardship projects conducted under S. 1470.

The impact of this legislation on inventoried roadless lands on the Beaverhead-Deerlodge National Forest is of particular importance to us. Three elements of the bill combine to sufficiently ensure these roadless lands will continue to provide core, secure habitat for fish and wildlife. The following elements of the bill must be retained in final legislation:

- Section 102 (a)(2)(A) of S. 1470 directs the Secretary to prioritize lands for stewardship projects which already have road densities in excess of 1.5 miles per square mile; where habitat connectivity is already compromised due to past practices; and where forests are at high risk of severe wildfire. We believe this language appropriately focuses stewardship logging and restoration activities in previously roaded and developed areas of the Beaverhead-Deerlodge National Forest.
- The bill explicitly requires all stewardship projects to be conducted in accordance with existing environmental laws, regulations and administrative directives. Thus, the current administrative directive protecting inventoried roadless lands, as well as the 2001 Roadless Area Conservation Rule currently in effect in Region 1 of the U.S. Forest Service, will continue to apply to projects conducted under the provisions of this bill.
- Forest Plan designations of appropriate lands for timber harvest will guide where stewardship projects occur. On the Beaverhead-Deerlodge, lands designated as “suitable for timber production” do not include any inventoried roadless lands. Lands designated as “timber harvest allowed to meet other resource objectives” do include inventoried roadless lands; however, projects in this category must comply with national roadless policies and directives.

For these reasons, we believe S. 1470 sufficiently protects the conservation values of inventoried roadless lands. We believe the Forest Jobs and Recreation Act will help improve the stewardship and management of national forest lands in Montana and benefit the northwest corner of the Greater Yellowstone Ecosystem.

Conclusion: S. 1470 is a balanced vision for protecting and restoring public land:

The Greater Yellowstone Coalition strongly supports S. 1470 and believes it provides a balanced approach to protecting and restoring public land in Montana. By protecting key public lands in southwest Montana, S. 1470 contributes significantly to the long-term conservation of the Greater Yellowstone Ecosystem, an area of great importance to Montanans and all Americans. While we believe some amendments are necessary to strengthen the bill, the boundaries of the wilderness and other special designations should not be changed.

We sincerely thank Senator Tester for his leadership in drafting this important legislation and his ongoing work to see it enacted. We also thank Senator Baucus for his co-sponsorship. This legislation enjoys unprecedented support across Montana as diverse interests unite behind our Senate delegation to protect and restore our treasured public lands.

Testimony prepared by:

Mike Clark, Greater Yellowstone Coalition Executive Director
mclark@greateryellowstone.org, 406-586-1593

Barb Cestero, Greater Yellowstone Coalition Montana Director:
bcestero@greateryellowstone.org, 406-586-1593

List of Attachments:

- Attachment A:** Map depicting currently available lands for snowmobiling within a 20-mile radius of Island Park, Idaho.
- Attachment B:** Map depicting changes under S. 1470 in the lands available for snowmobiling within a 20-mile radius of Island Park, Idaho.
- Attachment C:** Aerial photo of Mount Jefferson with the state line.
- Attachment D:** Photo of Rheas Peak with the state line.
- Attachment E:** Photo documentation of snowmobile trespass in the BLM Centennial Mountains Wilderness Study area and Forest Service snowmobile closure in the Hellroaring Basin.
- Attachment F:** Topographic map of the Hellroaring Basin and Mount Jefferson.

