FIVE VALLEYS AUDUBON SOCIETY
P.O. BOX 8425
MISSOULA, MT 59807

January 17, 2008

The Honorable Senator Denny Rehberg:

The Five Valleys Audubon Society of Missoula, Montana is an active 450-member group of citizens organized in support of bird and wildlife habitat and conservation, and public education in Western Montana.

Bitterroot Resort (2007) has proposed a large ski area development within the Bitterroot and Lolo National Forest Lands and immediately adjacent to the 920 acre Carlton Ridge Research Natural Area (RNA) within the Lolo National Forest. This RNA was established in 1987 to achieve National Objectives (attached) due to its unique ecological setting for alpine larch, its hybrids with western larch and for whitebark pine forest (US Forest Service 2005). In addition, RNA establishment recognized the interaction of this unique forest with numerous other plant and wildlife species. The Lolo National Forest proposes to expand this RNA to include previously omitted hybrid larch and whitebark pine habitat.

The Five Valleys Audubon Society is opposed to the Bitterroot Resort development of ski runs and associated activities within the Lolo National Forest, specifically within or adjacent to the Carlton Ridge National Research Area and within the whitebark pine and alpine larch ecosystems for the following reasons:

1. Ski run clearings and associated activities adjacent to the Carlton Ridge Research Natural Area are not compatible with the RNA ecological processes and research establishment objectives.
2. Off-run skiing and especially snowmobile use as the Bitterroot Resort (2006) proposes within the Carlton Research Natural Area, will have significant negative-impacts on natural processes, wildlife and their habitat, and research.
3. The cleared ski runs will provide openings where the bird, Clark's Nutcracker, will cache whitebark pine seeds. Whitebark pine is an imperiled high elevation tree species due to introduced blister rust and removal of fire as a natural process. However, regenerating seedlings will not be allowed to reach cone bearing-sized trees in the ski runs. This is potentially a genetic loss of white pine blister rust resistant selection for whitebark pine and loss of replacement trees needed to offset the exotic white pine blister rust mortality that is occurring.
4. The Varied Thrush is a National Audubon Watchlist species of conservation concern that inhabits higher elevation forests and would be negatively impacted by creation of ski runs.
5. A need to protect the ski area developments from wildland fire will place tremendous pressure on the US Forest Service to suppress wildland fires in the immediate area, specifically within the whitebark pine and alpine larch forest ecosystems, and within the Carlton Research Natural Area. Ski area development will also limit fire-restoration treatments. Wildland fire, natural or management-ignition is necessary for the restoration, establishment and natural ecological maintenance of the fire-dependant whitebark pine, alpine larch and hybrid larch forest ecosystems. These processes are key to why the Carlton Ridge Research Natural Area was established and for the maintenance of adjacent high elevation forests ecosystems.
6. A developed ski area to the west of the Carlton Ridge Research Natural Area will prevent the Lolo National Forest's proposed expansion of the existing RNA to include omitted hybrid larch and whitebark pine habitat.

This area of concern to us has special ecological significance that deserves continued protection. Thank you for your consideration and support in maintaining the superb values of our National Forests.

Sincerely,

Paul Loehnen, President Five Valleys Audubon Society

Enclosure