

June 26, 2007

District Ranger Chuck Oliver  
Darby Ranger District  
Bitterroot National Forest  
P.O. Box 388  
Darby, MT 59829

**RE: Opposition to Ravalli County Mining Proposal to Quarry Lost Horse Crag  
on Popular US Forest Service Land**

Dear Ranger Oliver:

I write today on behalf of the Access Fund with regard to the proposal from Ravalli County to mine the Lost Horse Quarry on the Darby Ranger District, Bitterroot National Forest. On behalf of the Montana and national climbing communities, we urge you to terminate all efforts to process the proposed destruction of the valued and long-standing recreational resource at Lost Horse.

**The Access Fund**

The Access Fund is a 501 (c) 3 non-profit advocacy group representing the interests of approximately one million rock climbers and mountaineers in the United States. We are America's largest national climbing organization with over 15,000 members and affiliates. The Access Fund's mission is to keep climbing areas open and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission.

Working in cooperation with climbers, other recreational users, public land managers and private land owners, the Access Fund promotes the responsible use and sound management of climbing resources. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers. Many of our members live and climb in Montana. For more information about the Access Fund, log on to [www.accessfund.org](http://www.accessfund.org).

The Access Fund works closely with the US Forest Service (USFS) on any management decisions concerning rock climbing given the memoranda of understanding (MOU) that the Access Fund has with the USFS relating to any climbing management initiatives.<sup>1</sup> The purpose of this MOU is to develop and expand a framework of cooperation upon which mutually beneficial programs, projects, training, and other recreation activities may be planned and accomplished on National Forest System lands by the USFS and the Access Fund working cooperatively at the

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<sup>1</sup> See <http://accessfund.org/pdf/AF-03-MOU-USFS.pdf>.

national, regional, and local level. “Such programs, projects and activities complement the USFS mission and are in the best interests of the public.”<sup>2</sup>

The Access Fund also works very closely with our affiliate organizations in Montana, in particular the Bitterroot Climbers Coalition (<http://bitterrootclimbers.org>) and Southwest Montana Climbers Coalition ([www.montanaclimbers.org](http://www.montanaclimbers.org)), who have been very active on several climbing and public lands issues across western Montana.

### **The Lost Horse Mining Proposal**

The USFS scoping notice proposes the removal of 125,000 to 150,000 cubic yards of material over 10 years. Ravalli County would “remove loose rock from the pit, and excavate new material with a crawler tractor, loader and dump trucks. There would be a primary crushing plant on site to process the rock material.”<sup>3</sup> The area of operations would be approximately 4.9 acres in size, thus barely excluding the proposal from the requirement that any mining operations of 5 acres or more must have formal environmental analyses. Every year for ten years, 750 large mining trucks would use the county road currently frequented by tourists, home owners, and recreational users of the Lost Horse Canyon area.

The USFS’s stated purpose and need for this project is “Disposal of mineral materials, as defined in 36 CFR 228.4(c),” which is a regulation that provides rules for operation plans under the authorization of the 1872 Mining law. This is not a statement of actual purpose or need, but rather a statement of legal authorization. Accordingly, the USFS has yet to declare a purpose and need for a gravel quarry, especially at the expense of the popular recreation and natural area at Lost Horse. In fact, the USFS has failed to demonstrate that the proposal is necessary at all and that there is a local need for the road materials or that the material cannot be found elsewhere. The USFS has stated that even if Ravalli County backs out of the deal then the USFS would open the quarry up for bid. In other words, some out of state contractor could benefit from this quarry while the local populace gets a hole in the ground to replace a favorite recreation area. The USFS should demonstrate its policy for force-feeding this mine to the Bitterroot Valley. If the USFS can show an actual need for the quarry, it should also demonstrate that there are no other alternatives for mining than Lost Horse.

Finally, public notice of this destructive proposal has been limited. Although many Montana locals climb regularly at Lost Horse and elsewhere in the Bitterroot National Forest, this proposal came as a surprise. Given the importance of this recreational resource and destructive nature of the proposal, the USFS should extend its public comment deadline beyond July 9, 2007 so that the Montana public and policy makers at all levels of government have a chance to become informed as to the long-range implications of a quarry at Lost Horse. Furthermore, the USFS should begin an adequate environmental analysis, compliant with NEPA, which assesses the cumulative impacts of such a mine at Lost Horse on recreation, the local economy, and the outstanding natural environment and resources in the area.

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<sup>2</sup> Id.

<sup>3</sup> USFS scoping letter, May 31, 2007, File Code 2850-12850.

## **The Negative Impacts of Mining at Lost Horse**

This issue has been in media<sup>4</sup> recently and controversy continues to mount due to opposition by public land users, local businesses, and regional homeowners. In fact, it seems that the USFS is the only entity supporting this mining proposal that would unnecessarily displace the use of a high-quality USFS recreation area at a time when the USFS is promoting a pro-recreation agenda that seeks “to identify challenges and solutions to meeting the nation’s recreation needs through our public lands and waters.”<sup>5</sup> Indeed, in the last few months the USFS has even convened regional public meetings “to prompt continued discussion and action toward enhancing America’s public lands and recreation resources.”<sup>6</sup> The Lost Horse Quarry proposal would work in direct cross-purpose with this Service-wide policy by destroying the recreational resource at Lost Horse and ignoring the needs of the recreation community in Montana and those that visit from abroad. A new industrial quarry site at Lost Horse will also choke off visitation that will, in turn, dry up tourist dollars in the Darby-Hamilton area of the Bitterroot Valley. Home values near the gravel plant or new trucking route will also be negatively impacted.

Many additional concerns have been voiced by local homeowners, business owners, and the hundreds of Montanans that recreate at Lost Horse:

### Public Recreation Damaged

- The mining proposal would install gates, restrict access, destroy the adjacent cliffs and trails, and close the area entirely from October through April every year for 10 yrs to accommodate crawlers, loaders, dump trucks, and primary crushing plant at Montana’s best climbing area.
- Lost Horse Crag is widely regarded throughout the state as perhaps its best easily-accessed multi-pitch traditional climbing area. Lost Horse Crag is unique, in part, because of the cliff orientation that allows year-round climbing opportunities.
- Expanding the rock quarry at Lost Horse—up to 3 or 4 times its current footprint—will compromise and destroy the adjacent cliffs and trails that Montana climbers have enjoyed for many years.
- The scenic camping near the cliff in the area is also outstanding and will be compromised by a nearby industrial plant
- The onsite crushing plant will create reverberations across the canyon, disturbing climbers, other campers and visitors, and disturbing wildlife.
- Safety is a significant concern. Blasting will threaten the safety of anyone climbing anywhere near the area, including the upper cliffs. Loose rock is a serious concern. Blasting will not only be a threat to people while they are actually blasting but also to climbers when they are not if it loosens rocks that otherwise were solid.

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<sup>4</sup> <http://missoulian.com/articles/2007/06/22/news/mtrregional/news08.txt>,  
<http://www.ravallirepublic.com/articles/2007/06/07/news/news04.txt>.

<sup>5</sup> <http://www.fs.fed.us/recreation/Rec-Forum.pdf>.

<sup>6</sup> Id.

### Natural Resources Destroyed

- Noise is a major concern for conserving the natural environment at Lost Horse. Reactivation of the quarry will negatively impact the scenic nature of the area, produce noise, disrupt wildlife such as migrating herds, wolverine, and peregrine falcons (which nest on the cliff), create a bigger footprint scar in the area and basically make the area too dangerous, unpleasant, or inaccessible for climbing or other recreational visitors.
- An onsite industrial plant will harm many sensitive natural resources. Reactivation and expansion of the quarry will destroy numerous climbs and threaten dozens more, but will also disrupt wildlife and negatively impact the visual and other recreational assets of the canyon including up to 75 nearby homeowners.

### Peregrine Falcons Harmed

Finally, a significant concern at Lost Horse is the presence of protected peregrine falcons on the cliff at Lost Horse. These birds trigger additional environmental analyses as to how the quarry proposal will affect these protected birds.<sup>7</sup> Peregrine falcons are protected by the USFWS delisting rule and are a “species of concern”<sup>8</sup> for the state of Montana. The USFS even designates the peregrine as “sensitive” due to the determination that “there is a concern for population viability within the state, as evidenced by a significant current or predicted downward trend in populations or habitat.”<sup>9</sup> Before the USFS takes any further steps to mine at Lost Horse, it must first assess the impacts of a quarry at Lost Horse on these protected cliff-nesting raptors. Unlike an industrial gravel crushing plant, climbing has been found to be compatible with cliff-nesting raptors across the country.

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The Access Fund urges you to terminate all efforts to approve a quarry at Lost Horse, whether by Ravalli County or anyone else. This mining proposal does not recognize or consider the unique recreational asset of Lost Horse. Many climbers and other users enjoy Lost Horse every month of the year, and even if climbers are somehow accommodated, the USFS grossly underestimates the safety and access issues at Lost Horse. In addition, businesses and home values will suffer and sensitive species could be irreparably harmed. Accordingly, Ravalli County should remove its

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<sup>7</sup> Peregrine falcons were officially delisted at the federal level in 1999, and by the state of Montana in 2005. The recovery goal for Montana was 20 active nests. A 5-year post-delisting monitoring program was mandated under the Endangered Species Act to ascertain the status and trends of peregrine numbers. The Montana Peregrine Falcon Working Group coordinated that survey effort from 1999 – 2003. In 2006, the survey documented 65 active nests that fledged 147 young from those nests, however, monitoring protocols call for intensive surveys every 3rd year until 2014.

<sup>8</sup> [http://fwp.mt.gov/fieldguide/detail\\_ABNKD06070.aspx](http://fwp.mt.gov/fieldguide/detail_ABNKD06070.aspx).

<sup>9</sup> <http://fwp.mt.gov/fieldguide/statusCodes.aspx#usfs>.

quarry application and the USFS should instead manage the area for its highest value: an unique and irreplaceable recreational resource.

Please contact me if you have any questions or comments regarding any points raised in this letter. I can be reached at 303-545-6772 x102 or [jason@accessfund.org](mailto:jason@accessfund.org).

Best Regards,

Jason Keith  
Policy Director  
The Access Fund

Cc: US Senator Max Baucus  
US Senator Jon Tester  
US Representative Denney Rehberg  
Montana Governor Brian Schweitzer  
Ravalli County Commission  
Kathleen Driscoll  
Carlotta Grandstaff  
Alan Thompson  
James E. Rokosch  
Greg Chilcott  
Barry Paulsen, Deputy Forest Supervisor, Bitterroot National Forest  
Bitterroot Climbers Coalition  
Southwest Montana Climbers Coalition  
Ravalli Republic  
The Missoulian