

Appeals-northern-regional-office@fs.fed.us

Gold Butterfly Project Objection

RE: Gold Butterfly Project Objection

Gold Butterfly

Responsible Official: Matt Anderson Bitterroot National Forest Supervisor

Bitterroot National Forest

Stevensville Ranger District

Jeffrey Shearer (Interdisciplinary Team Leader), Tami Sabol (no longer the district ranger),
Danelle Highfill (acting district ranger, but is leaving tomorrow)

Dear Objection Reviewing Officer

I am a resident of Hamilton and I spend a lot of time in the forest. I am concerned at the uptick in timber mandates and its affect on the Bitterroot National Forest and its resource of beauty that attracts people with outside incomes to this valley. I have commented on both scoping and DEIS on this project and I would like to include those as reference.

First thank you for making an effort to bring the Willow Creek road to BMP's. I saw the devastation of the road failure (a road far above the stream) that sent a debris flow across a lower road paralleling the stream and then entered the stream. This is a necessary task, but could be completed for less money than adding a 8-15 year timber sale to the mix that requires the reconstruction and building of new roads and skid trails that will add sediment in the short term and in the long term since the BNF does not have sufficient budget to maintain BMP's over time. I also agree with the decommissioning of roads in the Willow Creek watershed as decided in the Travel Plan. I am also glad to see that you close Burnt Fork Rd. at the Gold Creek campground and move the Gold Creek trailhead to the Gold Creek campground and to close NFSR 969A at the junction with NFSR 969 (Willow Creek Rd.), move the trailhead to the junction, and develop trailhead facilities.

Unfortunately, I do not agree nor see as necessary the remainder of the project other than to appease the timber mandates that spur the BNF budget. I would agree with work to protect structures within the Community Protection Zone (CPZ) approximately 150-200 yards from structures designed to protect structures and protect landowners as well as firefighters.

I see that you say you have modified Alternative 2 to align with public comment, the Bitterroot Restoration Committee, the Ravalli County Collaborative and community interests. However, the majority of public comment including a letter signed by 3000 members of the public asked for a modified alternative 3 that included only non-commercial treatments in Old Growth and no new road construction or re-construction. I am amazed that the BNF could ignore the effort made at an alternative workshop by the unpaid public, all of the field trips and meetings attended by the unpaid public, and comments written by the unpaid public. The final decision should have been the modified alternative 3 that the public requested or to heed the BRC and RCC who could not support alternative 2. Please do not call this a collaborative venture. It was a lot of work that was ignored.

I also see that you have ignored my fear that the project spans too much time and the current science shows your treatments do not meet the purpose and need of the project and climate change should put an end to any deforestation very soon. A long project is not advised at this time. The DEIS admits that the project will not produce local jobs. Smaller projects and non-commercial thinning in the CPZ would because the big timber companies would not touch a true restoration project.

I also see that you have added the reconstruction of the butterfly creek rd 13111. I do not believe this road has been mentioned before in scoping or DEIS and its reconstruction would be in violation of SMZ rules.

I will begin my objection with my issues as listed in my comments on the DEIS. You only addressed some comments in the ROD. Most of mine were not addressed.

Issue 1: The purpose and need of the project is to “improve landscape resilience to disturbances such as and fire”, but the process of commercial thinning goes against the best available science.

You have not addressed the two papers I referenced that show your project does not in fact meet this purpose and need.

Bradley et al 2016 (attachment 1) has shown that the heavy thinning prescribed in the Gold Butterfly Timber Sale will exacerbate fire severity rather than reduce it.

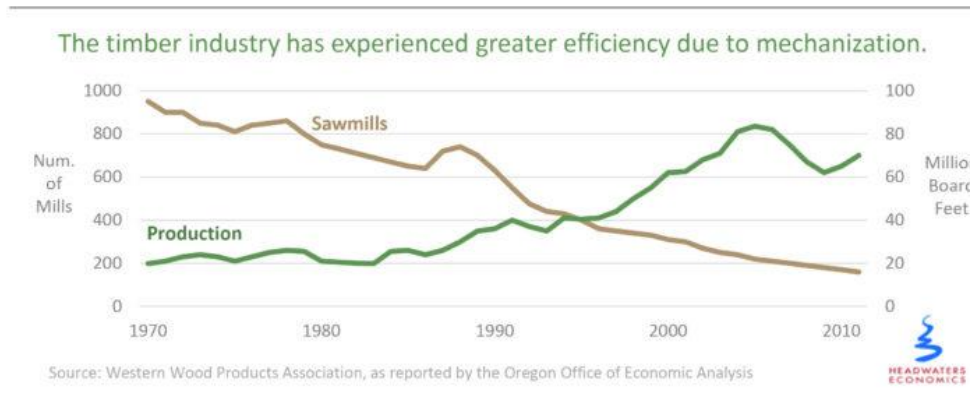
This project proposes to build 40 miles of new and reconstructed roads as well as adding 16 miles to the road system. But this study shows the role of roads and wildfires. (Attachment 2)

Resolution: Stop using the fear of fire to gain support for timber sales. Use current, peer reviewed scientific articles to support restoration projects. And educate the public on the necessity of fire which is a standard in the Forest Plan and teach them to create defensible space around their homes to prevent structure damage in the WUI. Do not build or reconstruct any roads for this timber sale and do not add any roads to the system even in storage.

Issue 2: The purpose and need to provide timber products and related jobs. This comes from the National Forest Management Act (NFMA) that urges national forests to promote and support timber dependent communities. First, our area is not a timber dependent community. It is more dependent on the recreation, blue ribbon fishing and hunting in the area as supported by Headwaters Economics (attachment 3). One of the Forest Management Plan (FMP) goals is to “provide sawtimber and wood products to sustain a viable local economy.” Yet the DEIS admits that, “due to the size of the product and lack of local mills, this will not increase local timber jobs.”

Resolution: If you wanted to support the small timber community in Ravalli County, it would be best to follow this study on creating defensible space and its effect on the local economy. Please see attachment 4. The study finds that defensible is much more lucrative and sustainable over time than timber. In a county where the most homes at risk for wildfire have been built in

the last 20 years, this seems a farsighted approach. It would also fulfill the FMP goal of educating the public about the necessity and inevitability of fire. An effort to connect timber and vegetation workers with local landowners to create defensible space projects would be money well spent. This would create viable sustainable local jobs that are not reliant on tax payer subsidies and a belief in jobs that no longer exist due to automation and demand. Please note the following chart showing that automation not a lack of logs is closing the mills.



Issue 3: The project goes against the FMP Goal pII-5 to, “Maintain habitat to support viable populations of wildlife species.” Wildlife Habitat will be irreparably harmed by this project. I am a part of the volunteer Wolverine Watch and was present when MPG Ranch biologist Kylie Paul screamed in joy at the sight of a mother wolverine with her three kits captured on video at one of the bait stations. The GB Timber Sale will affect a large area in and around known wolverine ranging habitat. It will greatly affect these and other creatures like them. Ms Paul told me that the Bitterroot is “just great habitat” we get excellent results down here. The GB Timber sale will have a deleterious effect on the gulo gulos and myriad species that enjoy the great habitat in the Bitterroot.

As always the BA suggests that EHE standards will protect bears lynx and wolverine species. However, the project and many projects before it have amended the EHE standards so in fact they will not be protected.

Resolution: Do not log outside the CPZ zone. Do not construct or reconstruct roads for this project. Do not add roads to the system. Leave the undetermined roads in their naturally decommissioned state. Follow the EHE standards.

Issue 5: This project will affect air quality for those living along the haul route. No studies have been done nor any cited concerning the dust created by haul trucks and how that will affect human health. They were also not notified of the project in a timely fashion so as to find time to research the affects on their health. There have also been no studies to ascertain the possible affects of dust from the vermiculite mine in the area. There must be a study to assure locals living near the haul route, timber workers and forest personnel of any health hazards due

vermiculite dust that might be on the road or in commercial logging areas and be introduced to the air during the operations of the timber sale. I do not feel you have addressed the needs of the people living along the haul route.

Resolution: A full study of dust and soil in the areas to be managed for vermiculite dust and then a study discerning any and all health hazards it might pose to human health should be conducted before going further with the project.

A thorough investigation of studies on dust from haul routes and its affect on human health should also be conducted and made available to the public giving them a meaningful opportunity to comment on this information before the FEIS.

Issue 6: The purpose and need for the project “to make forest more resilient to disease and insects” is inconsistent with the proposed action. Disease and insects are selecting for drought resistant trees that will be most resilient to climate change, disease and insect infestations. By choosing trees to cut for their commercial value, the forest service is very possibly leaving trees that will not genetically produce disease resistant trees see attachment 5.

Resolution: Let the forest naturally select for disease, beetle and drought resistant trees.

Issue 7: FMP goal is to “maintain fish habitat by minimizing the miles of road needed for management and to require high standards for road maintenance” II-5 is not consistent with the scope of the project. The timber sale will build 40 miles of new road with no promise or budget to maintain those roads or the existing roads in the project area. Sediment increase during the project is 789%. This is unacceptable and highly deleterious to Endangered Bull Trout and it will continue over a period of 10-15 years.

You address this in the ROD in saying that you thoroughly analyzed the construction of roads. But you did not analyze a project that might meet the purpose and need of the project and more align with public comment. Where is the analysis of a modified alternative 3 without this road construction? Where is the long term effects? How long will those BMP's last? For example, The Camas Road was graded and improved 6 years ago but is now impassible in some areas and there are many areas of water retention, road degradation, and sediment runoff. If we consider that example, the project will create an increase of sediment by 789% for the duration of the project 8-15 years. Then the roads., at BMP's will release less sediment until... 5-6 years later when without maintenance, they will be right back where they started. You have only analyzed the affects of road construction not increased road numbers and their degradation over time.

The Fisheries biologist agrees that this project will have a negative affect on bull trout, but fire would be worse The study Sestrich et al 2011 sited in the fisheries specialist report actually speaks of the benefits of fire to fisheries due to the creation of woody debris (log jams) in the rivers creating new structures and habitat for fish. (Clint M. Sestrich , Thomas E. McMahon & Michael K. Young (2011) Influence of Fire on Native and Nonnative Salmonid Populations and Habitat in a Western Montana Basin, Transactions of the American Fisheries Society, 140:1, 136-146)

Resolution: Rather than spend 1.6 million tax dollars to improve roads through a timber sale, spend just the \$256,000 required to bring existing roads to BMPs and then maintain them. This figure comes from the BNF site on Gold Butterfly under supporting documents. This would improve fisheries without the added roads that will degrade over time and the road construction that will severely increase the sediment in Willow Creek.

Issue 8: Road maintenance throughout the project will be maintained by the contractors and that cost will be subtracted from the timber sale. This issue is twofold.

First, the estimate of what it will cost is not part of the PNV, but the cost will be subtracted from the price of the sale so it will add to the cost of the project. This is not a full disclosure of cost and use of taxpayer dollars.

Second, the project will likely be split into five different projects. Which contractor will be responsible for which area of road at what time? This sounds like a logistical nightmare with water quality the all around loser. You have not addressed this logistical nightmare.

Resolution: Reduce the size and scope of the project to make it more manageable. Fully disclose all costs related to the project so the public has all of the information necessary to offer public comment.

Issue 9: The Economic analysis of the project should have included a economic feasibility study of the project with no new road construction or reconstruction to discover if a project that brings roads up to BMP's and commercially logs only areas around existing roads as was specified in a public workshop. Road construction considering the FS's ability to maintain its existing roads is a concern of the public and should be a concern of the FS. A thorough economic analysis of a project that removed this public concern should have been a part of the DEIS.

An attempt to glean this information or at the very least a cost breakdown of the reconstruction of 16 miles of undetermined roads was requested at the BRC meeting on June 25 and then an e-mail was sent to District Ranger Sabol on July 1 reminding her to send those questions so the specialists so they could answer them at the open house July 10. Nate Barber (economic analyst) was unaware of the questions at the open house on July 10 but said that a feasibility study would be out of his time frame he could supply us with cost of building the undetermined roads and the acreage and volume of lumber associated with the re construction of those roads. Still no answers were provided at the BRC meeting July 23rd. Sabol said the answers would be given the following week. Comments were due Monday of that week. I have not received the information this Monday July 30, the due date of the comments.

This has still not been addressed or analyzed.

Resolution: A full economic feasibility analysis of the timber sale without any road construction or re-construction as specified by the public at the workshop should be created and made available to the public for comment before the FEIS is created.

Issue 10: Weeds should be a huge part of the analysis of this project yet when the table 3.5-3 states that the weed introduction would not be "significant" but the information used to determine this was "unquantified." My understanding from the wildlife specialist is that

“unquantified” means no study was done. When the purpose and need of the project is to improve fire resilience, the weed issue must be taken into account. The nature of cheat grass has made even introducing fire to the landscape ineffective in regenerating native species. A large timber sale disturbs the soil which gives weeds especially cheat grass a chance to take over. The rare plant specialist was answering questions because the BNF is not going to replace their weed specialist who recently retired. She said that weeds will come in after the project but once the canopy closes after a timber sale, the native plants are able to re-establish. I wander through the Hayes Creek project quite often and ten years later, the canopy has not closed and the weeds are rampant.

A known area of Meadow Hawkweed is near unit 80 and St Johns Wort, Knapweed and cheat grass seeds are easily transported to the area. Soil disturbance is what brings in the weeds through a number of avenues. The project only addresses two ways to mitigate during the long term project, spraying along roads and spraying trucks.

Your answer to this is that you will spray for the existing knapweed. That is your weed control? Knapweed seeds last up to 7 years. Will you be spraying each year for seven years?

Resolution: A budgeted plan to minimize and reduce the influx of invasive species should be a part of every project on the BNF. Unit 80 is outside the WUI and should be dropped from the project. Logging should be minimized and relegated to the CPZ zone to reduce invasive species because they create a higher chance of a fire start. Road building should be only for improving existing roads.

Issue 11: Truckload comparisons between Alternative 2 and 3 are not correctly stated on page 11. My concern is that the sediment calculations comparing the two alternatives are based on this incorrect statement, “ Alternative 2 would likely result in potentially up to 50% more loads being hauled on the road system...” “Up to 50% more” is incorrect it is actually as low as 50%. If you compare the high estimation of loads for alt 3 (4000) to the low estimation of loads for alt 2 (6000) you get 50 % more loads. But if you compare the low to the low (3000-6000) it is double. More than that if you compare the low of 3 (3000) to the high of 2 (7000). My concern is that the sediment calculations comparing the two alternatives are based on 50% more truckloads creating a large discrepancy in the sediment information provided to the public comparing the two alternatives.

Once again not addressed. You are deceiving the public with this incorrect information.

Resolution: Provide a detailed accounting of how any sediment calculations using truckloads are quantified. Make this available to the public and especially to anyone who has commented on the DEIS or scoping for comment and consider those comments before the FEIS is published.

Issue 12: Visual Quality will be in violation of the FMP Goal to maintain a high level of visual quality on landscapes seen from population centers and major travel routes. The Scenery specialist claims that even though units 25e, 25f, 40c, 102, 124c, 129b, 134b, 171a, 171b & 171c

and 23a, 24b, 25b, 25d, 45, 46, 50a, 50b, 95, 96, 97, 124a, 175, 181 and 182 will be visible from main driving corridors. But they “will not be readily visible because the size shape and distribution of cutting units will be matched to natural landscape patterns.” If that is what they did for the Westside Project, they did not succeed in any way. Roads and clear cut scars are readily visible on highway 93 and the Lost Horse Road. These are 20 acre clear cuts. The Gold Butterfly Timber Sale will include up to fourteen clearcuts that are 40 acres in size. You cannot hide 40 acre clear cuts by “matching it to natural landscape patterns.” This project will violate FMP standards to retain visual quality. I am also concerned that in Appendix D-6, scenery standards 2 and 3 are not addressed.

Your answer to this is an extreme wide angle photo that barely shows the mountains and seems to camouflage the clearcuts and roads. Anyone driving down 93 can see the road cuts quite plainly.

Resolution: Reduce the size of clearcuts or eliminate them altogether from units visible from the road. Reduce the amount of timber being taken out of units especially in areas on either side of the roads. Do not build new roads or reconstruct undetermined roads. Please analyze visual Quality standard 2 and 3 for this project.

Issue 13: You are amending the Forest Plan for Elk Security again. Please remember that the FMP Goal pII-5 is to provide optimal habitat on elk winter range. You have amended the forest plan for 6 previous projects.

The forest Service must follow Forest Plan objectives to provide hunter opportunity not reduce it. The “Forest Plan objective is to provide sufficient habitat to maintain the current (as of 1987) level of big-game hunting... opportunities.” See USDA Forest Service 1987a, II-5, II-7. With new roads, logging and lack of cover in clear cuts (whether shelterwood, seed tree or reserve) and skit areas, elk will be displaced onto private land and preserve areas thus diminishing elk hunting opportunities. The proposed action is inconsistent with the Forest Plan standards for protecting elk security and habitat.

NFMA requires proposed forest plan amendments be evaluated for whether they would constitute a significant change in the long-term goods, outputs, and services projected for an entire National Forest. There is guidance in the Forest Service Manual 1926.51 that describe non-significant amendments. There is also guidance in the Forest Service Planning Handbook. An assessment of a proposed amendment’s significance in the context of the larger forest plan is crucial. 36 C.F.R. § 219.10(f), FSH 1922.5. Site-specific amendments are meant to address unique characteristics of a particular forest area, not conditions that are common throughout an entire forest or region.

For example, in *League of Wilderness Defenders, et. al. v. Connaughton, et al.*, plaintiffs challenged that the Snow Basin project area did not have distinguishing characteristics, and therefore a site-specific amendment was not justified. No. 3:12-cv-02271-HZ (D. Or. Dec. 9 2014). The court agreed with the plaintiffs, holding the agency’s decision to make site-specific amendments was arbitrary and capricious because the Forest Service failed to explain what conditions within the project area supported selection of a site-specific amendment over a

forest-wide amendment. *Id.* at 54-55. The court explained that a site-specific amendment “must be based on unusual or unique aspects of the site itself when compared to the forest generally.” *Id.* Therefore, if the Forest Service decides to use a site-specific forest plan amendment for this project, it must explain the unusual or unique aspects of the site itself that necessitate the amendment.

In addition, under the 2012 planning rules the Forest Service must determine which substantive requirements of the 2012 rule are directly related to the plan direction being changed by the amendment and apply those requirements accordingly. The 2012 planning rule requires early notification to the public of which substantive requirements are likely to be implicated, thereby facilitating public engagement and enhancing transparency. It also makes clear that the determination of which requirements are directly related must be based on the purpose and effects of the proposed amendment, using best available science, scoping, effects analysis, monitoring data, and other rationale to inform the determination. Finally, where species of conservation concern (SCC) have not been identified and an amendment could have substantial adverse impacts to or substantially lessen protections for a specific species, the responsible official must determine whether that species is a potential SCC and, if so, must apply the requirements of 36 C.F.R. § 219.9(b) of the 2012 rule to that species as if it were an SCC.

Issue 14: Old Growth is a rare occurrence due to the rampant logging that went on in the Bitterroot 30 years ago. Currently the BNF is deficient in old growth in 3rd order drainages in the project area. It should be left alone. You cannot save old growth by removing it from old growth standards. On a recent field trip, we were told that mistletoe was the problem. But in a forest service study, mistletoe is considered a good thing for wildlife and tightly spaced trees with mistletoe tend to reduce the ability for it to kill trees. This article states that the only reason to remove mistletoe trees is if you are managing for timber. It does not mention removing the trees to “save” old growth. The Forest Service Document states, “In areas where timber production or high recreation use are not the principal concerns, Douglas-fir dwarf mistletoe may not adversely influence management objectives and actions could be developed to maintain or possibly increase Douglas-fir dwarf mistletoe populations for wildlife habitat.”
<https://www.forestpests.org/acrobat/dougfirdm.pdf>

FMP standards on old growth state that OG stands may be logged and regenerated when other stands have achieved old growth status Standard 5 Forest management plan 11-20. Yet the DEIS admits that it is deficient in Old Growth in the area. This project is in violation of the Old Growth Standards in the FMP.

Resolution: Old growth stands should be identified and delineated first, then cutting units should avoid those stands. Mistletoe should be left alone in Old Growth units for wildlife as recommended in forest service document. No commercial logging should be allowed in old growth areas and areas that are close to becoming old growth should be identified on the ground and removed from any cutting units.

You have changed OG treatments to intermediate cuts, but you have not addressed the roads proposed to be built in OG stands. These are essentially clear cuts. Have you analyzed whether these roads take the stands out of OG status and are they legal in HFRA?

Issue 15: Rare plants surveys missed the timing window in units 11, 40, 75, 76, 160, 161, and 185. The specialist recommends “these units will need to be surveyed prior to implementation” in the DEIS. These units must be surveyed before the FEIS. If a rare plant is discovered after the contract is sold there is little that can be done to change the project.

Resolution: Survey these units and make sure that the information is made available to the public in order to provide meaningful opportunity to comment.

Issue 16: Timber has been found to be the number one producer of carbon emissions in two independent studies. Here is one:

<http://www.pnas.org/content/early/2018/03/13/1720064115> As climate change is looming, decreasing carbon emissions in any way that we can should be paramount to any other purpose and need of this project. If that means decreasing commercial logging, so it should be. You cannot justify a timber sale of this measure in light of climate change and these recent studies.

Resolution: Retain and increase forests for sequestration rather than decrease them through expensive commercial thinning. Even a burned forest retains substantial carbon.

Issue 17: The Boreal Toad should be protected as its numbers are dwindling.

Resolution: Limit any night hauling to avoid boreal toad mortality.

I also agree with and sign on to the comments of Friends of the Bitterroot, Wild Earth Guardians, Alliance for the Wild Rockies, The Bitterroot Restoration Committee and Jeff Lonn.

Please consider my objection and please keep me informed of any resolution meetings.

A photograph of a handwritten signature in black ink on a light brown background. The signature reads "Michele Dieterich" in a cursive script.

Michele Dieterich

