



**VIA Email:** [appeals-northern-regional-office@fs.fed.us](mailto:appeals-northern-regional-office@fs.fed.us)

July 29, 2019

Objection Reviewing Officer  
Northern Region  
Federal Building  
Building 26, Fort Missoula Road  
Missoula, Montana 59804

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment during the Gold Butterfly Objection Period.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Bitterroot National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC is not writing to submit an objection but rather to support your Draft Record of Decision. AFRC submitted scoping comments on July 13, 2017 on this project and then comments on the Draft EIS on June 14, 2018. The need to complete restoration work in the project area is paramount.

AFRC commended the Forest for planning the project under the expedited guidelines of the Health Forest Restoration Act (HFRA). This project meets the criteria for managing under the HFRA authority. Further the Forest has done a good job of reaching out to the public for input over the last few years including having two trips the project area and conducting one open house among other opportunities to comment. Finally to solidify the planning effort, the Forest has opted to do an EIS rather than an EA even though there was an initial finding of no significant impact created by this action.

AFRC supported the Forest implementing Alternative 2 because it would have done the best job of addressing the forest health issues, and a better job of reducing the high fire risk in the WUI, and will help to reduce sedimentation in Willow creek, all of which are high priorities for this project. That being said we support the Forest in your decision to select Alternative 2 modified. It is important to analyze input from the collaborative and local citizens. Two issues arose that made the Forest modify Alternative 2. Those issues were not doing regeneration harvests in the old growth areas, and reducing sedimentation from log trucks by creating optional haul routes and/or by reducing the number of trucks that will be traveling down the Willow Creek road. The final effects of both changes will mean a reduction in acres treated mechanically from 5,621 down to 5,461. While AFRC is disappointed with those reductions, we understand the Forest had to strike a balance.

The 5,461 acres that will be mechanically treated in this project is very important for providing the raw materials that sawmills within the State need to operate since so much of the Forests in Montana are owned by the Forest Service. The timber products provided by the Forest Service are crucial to the health of our membership and the counties and communities where they are present. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills.

With 6,600 acres of this project in the Wildland Urban Interface, and approximately 10,500 acres of treatment designated as insect and disease treatment, the project needs to move forward quickly. We have seen what devastating wildfires can do to the Forests and to homes and property over the last few years. We need to get treatment in the Gold Butterfly project before one of those large wildfires hits there.

With the needs and urgency to treat this area outlined above, AFRC feels the Forest should not modify its program of work should other objections be filed. The Forest should hold firm should they get to a Resolution phase. AFRC and our members look forward to being a partner with you as the Gold Butterfly project moves forward in the objection process and later into implementation.

Thank you for the opportunity to provide comments during the objection period on the Gold Butterfly project. I look forward to following the implementation of this project as it moves forward.

Sincerely,

A handwritten signature in blue ink that reads "Tom Paul". The signature is written in a cursive, flowing style.

Tom Partin  
AFRC Consultant  
P.O. Box 1934  
Lake Oswego, Oregon 97035