

BRC Objection Comments on Gold Butterfly Project

Bitterroot Restoration Committee

Contact: Van Keele

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July 22, 2019

Objections related to:

Gold Butterfly Project

Bitterroot National Forest

Responsible Official – Matt Anderson, Forest Supervisor

Located on the east side of the Bitterroot Valley between Burnt Fork and St. Clair Creek
encompassing ~55,147 acres

Following are descriptions of specific aspects addressed by this objection.

BRC's DEIS Comment – July 29, 2018

The Bitterroot Restoration Committee (BRC) has reviewed the Gold Butterfly Project Draft Environmental Impact Statement and wishes to submit the following comments. The BRC supports the purpose and need of the project, although we have concerns about the project's impacts on wildlife, habitat, old growth, and road-related sediment. We would like to have these concerns more fully addressed in the Final Environmental Impact Statement. Also, the BRC supports reconstruction done on the open roads to meet best management practices and to leave the roads in a condition to minimize future road maintenance. Finally, the BRC supports relocation of the Willow Creek and Burnt Fork trailheads as proposed.

The BRC thanks the Bitterroot National Forest for the opportunity to participate in the objection phase of the FEIS for the Gold Butterfly Project. We hope that you take our comments as constructive and with the intent of improving this and subsequent projects on the Bitterroot Forest. Although we cannot speak for the general public, we have reviewed the public comments to the DEIS and our comments align very closely with many of them. Our members have many years of natural resource management interests and expertise. It is with this background that we offer the following comments.

The Gold Butterfly Project covers an extremely large area – over 55,000 acres. This has the advantages in that it provides a better opportunity to address issues of scope and scale, to cope with potentially significant ecological impacts such as insect and disease outbreaks and wildfire and to evaluate the cumulative impacts of management actions. The downside is that any deficiencies in the assumptions upon which management activities are based or in the implementation of those actions will have recognizable, decades-long consequences.

Although the Agency may consider the implementation of certain treatments proposed by the Gold Butterfly Project to be important, even more essential are the project-specific mitigation activities and the scheduling of uninterrupted monitoring, both during and after completion of the project.

Following are statements which demonstrate a connection between our previous written comments on this project and the content of our objections.

The BRC has been involved in the GB project since before its current iteration, when it was a much smaller “Butterfly” project of a few hundred acres.

Throughout the life of GB discussions among BRC members, the main issues/concerns have been fairly consistent and outlined in the Committee’s DEIS comments, namely:

1 - ROADS

- Sediment concerns;
- Need for road upgrades and “maximal” road BMPs before, during, and after project implementation;
- need for road decommissioning;
- Cost of road construction; and
- Impacts of new road construction on wildlife, habitat, water quality, and fisheries including threatened bull trout.

2 - OLD GROWTH (OG)

- OG-associated species;
- Scarcity of OG on the BNF;
- OG habitat; and
- Social/human attitudes towards OG.

Our Committee conducted thoughtful discussions on whether OG should be treated with non-commercial understory thinning or simply left alone; however, we didn’t delve into the potential for any large scale commercial thinning of OG as proposed under Modified Alt 2.

3 - WILDLIFE and 4–HABITAT (especially relating to ROADS and OG)

While not referenced specifically in our DEIS comments (except tangentially through support of the project’s Purpose and Need), we also discussed fire, forest health and resiliency, insects and disease, and the WUI. Although we supported the stated P and N in our DEIS comments, our Committee did not reach a consensus agreement on the methods or management tactics to achieve the project’s P and N.

Given the issues raised in our DEIS statement, and the concerns of the Committee, we do not agree that the project’s Selected Alternative (Modified 2) is aligned with our Committee’s position as is claimed in the DROD (page 5). After reviewing the DROD and FEIS, we feel our concerns related to the project’s impacts on old growth, road-related sediment, wildlife, and habitat were inadequately addressed. The minor modifications to Alternative 2 do not reflect the changes necessary to resolve our concerns or to prevent us from having similar concerns with future projects.

While we support some aspects of GB, specifically the trailhead relocations, road upgrades and BMPs, we continue to have serious concerns as outlined below.

ROADS:

- We question the validity of statement (DROD, page 8): “Road construction was not determined to present a significant direct or indirect effect to any resource area, due in part to project design features.” Likewise for a similar statement regarding the re-opening 16.5 miles of vegetatively-reclaimed “undetermined” roads.
- For example, 10+ miles of permanent and temporary roads are proposed to be constructed through units with OG. Beyond the actual commercial thinning of the OG itself, we believe there will be significant direct and indirect effects on OG habitat, wildlife, and native vegetation by the introduction of invasive weeds.
- There are 6.4 miles of permanent and 17.3 miles of temporary road construction proposed, along with 16.5 miles of undetermined road re-construction. That totals 40.2 miles of road construction. We believe 40.2 miles of road construction will have significant effects, both direct and indirect. Those effects include reducing and fragmenting habitat, displacing wildlife and the disruptions of breeding and denning, introducing invasive weeds, being a significant cost (\$600,000+), and having direct financial effects on future forest road maintenance capabilities and current backlogs.
- When comparing the proposed road construction with proposed decommissioning there is an imbalance between ground-disturbing construction vs. actual ground-changing road decommissioning. Namely, 22.3 miles of roads are proposed for decommissioning but only 0.9 mile requires much actual work, as the vast majority have already naturally re-vegetated themselves.
- While there were some minimal changes to OG treatments from Alt 2 to Modified Alt 2, there was no reduction in road miles or additional road decommissioning to address Committee and broad public concerns.
- The Butterfly Road (FR 13111), a highly popular quiet use “trail,” is proposed to be opened for a road excavator and full-sized vehicle traffic for administration and contractor use. While it will be put into storage afterwards, the ground disturbance and recreation loss will be significant. It should be noted that, years ago, the BRC had strong reservations about opening this road to traffic during the original “Butterfly” project due to its proximity to the creek.
- We are concerned that the reopening of the Butterfly Road (FR 13111) will not be in compliance with Montana’s Streamside Management Zone Laws and Rules (SMZ¹).
- Committee members are skeptical that the cost to open and then rehab the Butterfly Road (FR 13111) will result in an actual financial saving.

OLD GROWTH:

- Approximately 760 acres of classified OG are slated to be commercially harvested. While Modified Alt 2 now excludes certain OG regeneration harvests (including clearcuts), the project significantly decreases the percentage of OG in multiple 3rd order drainages, including down to the minimum Forest Plan requirement in certain management areas (8%). Forest-wide the Bitterroot has approximately 12-13% OG; currently the Sapphires have approximately 10%. The 2005-06(?) attempt at a Forest Plan revision had a Forest-wide goal of increasing OG to 15-20%. The amount of OG harvest proposed in GB moves us away from, not toward, that goal.
- There was agreement among BRC members that non-commercial treatments may be beneficial to OG stands. No alternative was provided, nor were demonstrable changes made to

¹ <http://dnrc.mt.gov/divisions/forestry/docs/assistance/practices/smzfullcopy.pdf>

Alternative 2, that provided a middle-ground solution which might have garnered Committee and/or public support. As it stands, the modification of treatments in OG in Selected Modified Alt 2 do not go far enough in resolving the issues raised by BRC members and the public at large surrounding this and future projects.

- Old growth control stands would be critical in monitoring treatment effectiveness and the use of adaptive management.

WILDLIFE, HABITAT:

- The BRC is concerned with the potential impacts on bull trout, as recognized by the statement: “No impacts to species or their habitat would contribute towards federal listing or lead to adverse impacts, except bull trout.”

RECOMMENDATIONS:

- Reconsider the project’s proposed actions/treatments and their possible impacts on OG, wildlife, and habitat.
- We would like the Forest to elaborate on how it plans to monitor activities associated with the implementation of the GB project. Based on past experience, some members of the Committee are not convinced that stand treatments will be implemented exactly as prescribed, that assumptions related to maintaining OG characteristics are completely valid and, even if resulting stand conditions meet definitions of Green et. al.², they will continue to function as OG habitat.
- With the objective of learning from this project, we would have liked to have seen more of Alternative 3 (no harvest in OG and no new roads) incorporated into the selected alternative. This would have provided the opportunity to compare habitat conditions between treated and untreated stands, which could go a long way in substantiating or refuting the Agency’s ability to create OG habitat through timber harvest. Reducing proposed road construction would help address some of the concerns over road densities, sedimentation to streams, impacts to wildlife solitude, and habitat fragmentation.
- Our Committee is familiar with U of M Professor Andrew Larson’s researched ICO approach to forest restoration³ (“Individuals, Clumps, and Openings”). Prof. Larson gave a well-received program to the BRC. We recommend the BNF use this management approach in the Gold Butterfly Project. We want to know if the Forest Service agrees with this research of Larson’s and whether the resulting concepts will be implemented on the Gold Butterfly Project.
- Our Committee has reviewed the Seven Hessburg et al., (2015)⁴ principles and recommends that Gold Butterfly follow these principles.

Thank you,

/s/ *Van Keele*

² https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd591845.pdf

³ <https://scholarworks.umt.edu/cgi/viewcontent.cgi?article=1002&context=ico>

⁴ <https://www.fs.usda.gov/tresearch/pubs/49805>