

Objection Comments

Project - Gold Butterfly

Stevensville Ranger District – Bitterroot National Forest

Forest Supervisor – Matt Anderson

I write these objections with concerns for the forest, wildlife, and the manner in which Bitterroot National Forest personnel have conducted public involvement.

Collaboration and Public Involvement

The “Gold Butterfly Alternative Development Meeting” held on November 30, 2017 is an example of public interest and citizens willing to collaborate. Old Growth, roads, and wildlife were major concerns expressed that evening. The meeting resulted in the development of Alternative 3. I believe the BNF, perhaps purposefully, misrepresented the public’s sentiments at the meeting. Folks supported actions in Old Growth areas such as non-commercial treatments and controlled burns. An email, obtained through the FOIA, from District Ranger Tami Sabol states “. . . *it became obvious that it is difficult to definitively say that old growth characteristics would be retained following treatment. . . . Therefore, an alternative that would treat old growth only if we could retain old growth characteristics may be more than we can guarantee. However, analyzing an alternative that would not treat any old growth at all would be much simpler and gain us some efficiencies in the process. It would also provide a stronger contrast with the proposed action, in terms of effects*”. Gaining efficiencies, being simpler, and providing a stronger contrast is not what the public wanted. District Rangers and the Forest Supervisor routinely tout the need for collaboration, yet when the public provided input it was misrepresented by leadership; an opportunity at honest collaboration was lost, as was trust.

Page 5 in the DROD states that Forest Supervisor Matt Anderson selected Alt 2 modified, because it aligns with the suggestions from the Ravalli Country Collaborative (RCC) and the Bitterroot Restoration Committee (BRC). It should be noted that neither the RCC nor the BRC endorsed the Gold Butterfly project. Mr. Anderson’s statements are misleading and the lack of endorsement from these two local collaboratives should have been made clear in the documents released to the public.

Old Growth

Emails from Tami Sabol, Nate Barber, and others (Tuesday, December 19, 2017 1:26:00 PM) state that “*During our conversations, it became obvious that it is difficult to definitively say that old growth characteristics would be retained following treatment. Any treatment activity (e.g., logging, burning, etc.) has the potential to inadvertently remove stands from old growth status due to events beyond our control (e.g. windthrow, unintended prescribed fire effects). Therefore, an alternative that would treat only if we retain old growth characteristics may be more than we can guarantee*”. Page 3 of the DROD states that “. . . *all treatment units containing old growth would retain their old growth status under the selected alternative*”. Regarding a modified Alternative 2, Mr. Anderson on Page 5 in the DROD states that “*Large diameter trees and old growth characteristics sufficient to keep old growth status will be*

retained through implementation activities. . . . Jeff Shearer (Project Manager) expressed those same sentiments at the July 22, 2019 BRC meeting regarding retaining old growth characteristic. The emails associated with District Ranger Tami Sabol and Forester & IDT Leader Nate Barber make it clear of the difficulty of ensuring/retaining old growth characteristics after treatment, yet Project Leader Jeff Shearer and Forest Supervisor Matt Anderson claim they can. There seems to be opposing views on this within the BNF. While this claim is made regarding retaining Old Growth characteristics, I've found nowhere in the pertinent documents of exactly how it will actually be carried out on the ground.

Alternative 2 modified, changes activities in 16 units containing old growth. Jeff Shearer stated at the BRC meeting that these changes were brought forth by suggestions from the BNF silviculturist and biologist. However, emails obtained by the FOIA between Dave Lockman, Cheri Hartless, and Warren Appelhans seem to contradict this statement. These emails describe existing conditions, Diagnosis, and RX-Modified. Diameter caps were recommended in most of the units to help ensure old growth characteristics were met. As noted in the same email *"Diameter caps have been used in previous treatment of old growth units on the Forest with much success"* and these suggestions *"meet the purpose and need and retain old growth characteristics"*. These treatments are not what were selected in Alternative 2 modified. Who made these changes?

It is my understanding that the HFRA in Sec. 102 directs the Forest Service to maintain, or contribute toward the restoration of old growth stands according to pre-fire suppression characteristics. Jeff Shearer, at the BRC meeting, stated that the HFRA did not come into play regarding the changes made to the 16 units containing old growth. Who made the changes?

I have not found in documents supplied by the BNF an analysis or discussion of the impacts of changing the treatment in those 16 units. This is a major change that appears to have had no environmental analysis done. There are claims that old growth status and characteristics will be maintained/retained but I've found no outline of scientific methodology or discussion of how it will be retained, nor any other possible impacts associated with the treatment change.

The DEIS speaks of historic (desired) conditions, yet this project and its treatment of Old Growth is moving the forest away from historic conditions.

Roads

Alternative 2 modified will have 17.3 miles of temporary roads, 6.4 miles of specified roads, and 16.5 miles of ghost/undetermined roads for a total of 40.2 miles. The FEIS claims 22.3 miles of roads will be decommissioned but only .9 of those miles actually require work. Building 40 miles of road but only doing work on .9 miles for decommissioning is not what the public wants on this project and twists the sentiments expressed during scoping and public involvement. Stating that 22.3 miles of roads will be decommissioned (with only .9 miles needing any type of work) is very very misleading to the general public. Building 40 plus miles of roads even though the BNF admits that road use and management were main points during scoping and public meetings is in bad faith regarding public collaboration.

Given impacts such as habitat fragmentation, sediment, vandalism, litter, poaching, illegal OHV and mountain bike trails, cost of maintenance, impacts to big game, the spread of noxious weeds, fires associated with increased access, lack of law enforcement, and dust concerns, it is simply amazing the Bitterroot National Forest Supervisor can claim that *“Road construction was not determined to present a significant direct or indirect effect to any resource area, due in part to project design features” (DROD p. 8)*. This is an amazing statement given the known, scientifically documented impacts associated with roads.

Some of these roads will go directly through Old Growth stands and all of the impacts mentioned above will occur. Given roads and old growth were two of the many concerns brought forth by the public, how can you assure the public that those new roads will not contribute to the decline of old growth characteristics or status?

The BNF seems to be unable to enact any logging project without an EHE site specific Forest Plan amendment, the Gold Butterfly project is no exception. The BNF is already out of compliance yet wants to build more roads. The BNF simply wants more and more and cannot currently pay for the road work/maintenance needed on the forest. As someone who has had to live on a budget, take care of what I’ve had, and as a taxpayer, I find this approach questionable at best.

Climate Change

Sec. 2 Purposes of the Healthy Forest Restoration Act requires projects implemented by the Forest Service to:

(C) to enhance productivity and carbon sequestration.

Page C-16 of the Gold Butterfly FEIS Appendices – “Estimates of carbon emissions related to log hauling were calculated and included in project file (PF-CLIMATE-002). It states, *“This estimate only covers log truck traffic, which accounts for the bulk of fossil fuel greenhouse gas emissions.”*

The specialist reports state:

“Thus, even though some management actions may in the near-term reduce total carbon stored below current levels, in the long-term they maintain the overall capacity of these stands to sequester carbon, while also contributing other multiple-use goods and services (Reinhardt and Holsinger 2010)”. (page 5 Climate 001)

The proposed stand vegetation and fuel reduction treatments would reduce existing carbon stocks and temporarily reduce net carbon sequestration rates within treated stands, in some areas possibly enough that for the short term the stands would emit more carbon than they are sequestering. These stands would remain a source of carbon to the atmosphere (or weakened sink) until carbon uptake by new and remaining trees again exceeds the emissions from decomposing dead organic material. As stands

continue to develop, the strength of the carbon sink would increase then gradually decline, but remain positive. (page 5 Climate 0001)

The specialist's reports don't really address how GB will enhance carbon sequestration and time is now of the essence. 2030 is recognized by scientist (IPCC Special Report 2018) as a critical year regarding climate change. I doubt the areas being treated in Gold Butterfly will be carbon sinks by that time. Your preferred alternative is contributing to climate change.

I believe Sec. 601 also requires the Forest Service to address issues including the "quantification of carbon uptake rates". Please explain (please don't say refer to specialist reports) how Alternative 2 with modifications addresses the HFRA requirement of carbon sequestration and addresses the crisis of climate change.

Monitoring

It's my understanding that the HFRA, Sec. 102 requires monitoring. Please state how Gold Butterfly will comply with monitoring requirements of the HFRA.

Fire

The DROD mentions lack of fire on the landscape compared with historic conditions several times. I believe it is a true statement but misleading to the public. The Forest Plan for MA1 which much of the area is in, states that *"Fire planning will be designed to protect and enhance timber investments and values. Prompt control action will be taken on all wildfires. All types of fire suppression equipment may be used"*. Stating that existing condition may be primarily characterized by a lack of fire but failing to say anywhere in the GB documents that the Forest Plan calls for the BNF to take prompt control action on all wildfires is not telling the full story to the public. Please make that clear in future project documents.

Conclusion

Many commenters suggested Alternative 3 or Alternative 3 modified. Either of these Alternatives would meet the purpose and need. Two local collaboratives could not endorse the project as it currently stands. Roads, old growth, wildlife and water quality were repeatedly brought up by the public and various groups. If the BNF is truly interested in implementing meaningful collaboration, you have a golden opportunity. Implement Alternative 3 with the modifications desired by the public. You can have a project that will be less controversial, is supported by a large percent of commenters, meets the Purpose and Need, and helps restore faith in an honest working relationship with the Bitterroot National Forest.

Sincerely,

Gary Milner



