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Objection Reviewing Officer

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Objection Comments

Project - Gold Butterfly timber sale (G-B)

Stevensville Ranger District – Bitterroot National Forest

Forest Supervisor – Matt Anderson

I hereby incorporate by reference my comments to the Gold Butterfly timber sale DEIS and to the alternative development workshop. Both time consuming efforts are pretty much ignored by the agency managing public lands that I partly own.



LAC comments G-B alt devlpmt workshc



LAC comments G-B timber sale DEIS.doc

1) Issue - Irrational behavior and lack of best available science:

(p.1, LAC, G-B DEIS comments) “The Bitterroot NF is stuck in an outmoded forest management paradigm and justifying it with outdated science, especially fire and climate change. (A quick review of appendix E, Literature Cited, shows very few citations from the 21st century.) This results in some serious cognitive dissonance. Logging old growth to save it; recognizing impacts of past indiscriminate fire suppression while still practicing indiscriminate fire suppression; and going to great expense to partially fix problems caused by a too dense and unmaintained road network while building new roads at great expense with no assurance of adequate maintenance funds are just some of the mind-bending scenarios we are faced with. It has the appearance of a perpetual forest management budget machine run on taxpayer dollars, managing for job security rather than a “healthy forest”.”

This issue continues unabated.

Remedy: Revisit this project and develop an alternative is based on best available science as well as transparent rationales.

2) Public process and lack of “collaboration”.

(p.3, LAC, G-B DEIS comments) “The “alternatives development workshop” was an eye opener, showing the strong divergence between the public participants and the BNF in management direction of the public’s forest. The zones of agreement expressed by the public participants couldn’t have been more clear, but the BNF ID team managed to misrepresent, in Alternative 3, what those were in what seems to be a willfully disingenuous attempt to undermine the intent and spirit of the public comments as well as marginalize Alt 3. The opening of 16.5 miles of “undetermined” roads is tantamount to building new roads, and in no way represents the public comments advocating no new roads. Eliminating non-commercial thinning from below to improve fire resilience in old growth stands is contrary to the expressed public comments”

(LAC Comments G-B alt dvlpmnt workshop) “I attended the Alternative Development Workshop on Nov. 30, 2017 where I heard this “alternative development” is a facet of “collaboration” with the public. It is my understanding that the ill-defined “collaboration” process aims at discovering “zones of agreement”. It was very clear at the meeting that, far and away, the primary zone of agreement was concern about the damage from roads. There was little to no clamor for more logging or fear of fire expressed by the public at that meeting.”

The present preferred alternative is only a marginal improvement and does not represent the results of public comments. Claims of genuine “collaboration” are dishonest given the misrepresentation of the results of the ‘workshop,’ dearth of consensus comments by the RCC and the defects in “collaboration” described in the BRC consensus Objection.

Alternative 3 was deliberately manipulated to misrepresent what the public wanted regarding road construction and OG. The public wanted no road construction. By including 16.5 miles of undetermined/ghost road reconstruction in Alt 3, the BNF perverted the public’s comments and priorities. Also, the public repeatedly requested light handed OG treatments (e.g. prescribed burning, non-commercial thinning); they did not ask for no treatment whatsoever. In emails that were obtained through FOIA FS personnel including then Stevensville District Ranger Sabol chose the “no treatment in OG” to create a more stark contrast between the 2 Action alternatives. It did not represent what the public wanted.

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. Supervisor 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.



BRC Objection on
GB (final) - 22jul19.d

(BRC Objection) “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.”

(p.3, LAC, G-B DEIS comments) “I am noticing many more people increasingly aware that public comments are not meaningfully incorporated in FS decisions. Thankfully, you are being flooded with sincere and well-founded comments anyway, and people are watching more closely. Many are aroused to action by both the ecological foolishness and by the sham public involvement.”

The BNF repeatedly (see Westside timber sale for example) misuses and misrepresents “collaboration”, including especially the results of the two “official” collaboration committees. This BNF behavior discounts the work of the committees, wasting citizen’s time, and causes the public to dismiss “collaboration” as a hoax.

It is evident that the citizen distrust of the BNF is increasing both due to BNF disingenuous analysis and virtually meaningless public involvement and the increasing public concern about functional ecosystems.

Remedy: Begin again and try to meaningfully and accurately implement public involvement along with transparent and accurate analysis and disclosure.

3) Overuse of Project Specific Forest Plan Amendments

(p.3 LAC, G-B DEIS comments) Overuse of project specific Forest Plan amendments legal loopholes makes the Forest Plan arbitrary and simply voluntary.

Remedy: Design an alternative that does not require any amendments to the Forest Plan.

4) Forest Roads impacts

(p.4, LAC, G-B DEIS comments) “Roads reduce groundwater recharge, groundwater storage, and late season stream flows. An often-overlooked aspect of sediment in streams is the fact that the sediment leaving the hillsides represents a loss of groundwater storage capability as well as loss of soil productivity. Additionally, the compacted surface of roads reduces the infiltration of rain and snowmelt causing rapid surface runoff, thereby reducing late season streamflows which would normally be fed by groundwater slowly percolating through the soil. What is the volume of ground water normally intercepted by roads in the project area? What is the total road surface area that inhibits infiltration of snowmelt and precipitation? Accounting for elevational differences in precipitation, what is the volume of water effected? Accounting for the slope and soil characteristics, what is the advance in timing of runoff? Lowered late season flows is a steep price to pay for roads. The price gets paid repeatedly, year in and year out. Climate change, characterized by flashy snow melt, intense rainstorms and increased evaporation will exacerbate the issue and put a premium on groundwater infiltration and storage.”

This issue is given very little attention, especially in light of the significance of water availability.

The DROD claims 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 absurd statement. Such a statement can’t be supported by science or common sense. I can only hope some tricky, undisclosed context is involved and not inexcusable ignorance of obvious facts.

Remedy: Do not build new roads. Do not disturb vegetation on old ‘undetermined’ roads. Rip and recontour more roads.

5) 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) This conclusion does not take into account that the climate has and will continue to change. Regen failures are readily apparent.

(p.3, LAC g-B DEIS comments) “Framing these [environmental] issues are the impacts of climate change that trump all and will increasingly exacerbate all the other issues.”

Logging is a major contributor to climate change due to interruption of and removal of sequestered carbon. Also, it is becoming increasingly apparent and backed up by best available science, that regen after fire and timber sales is not proceeding the way it used to here on the BNF. Regen failures are accumulating. The BNF needs to account for this through analysis and disclosure in NEPA documents. While Ethiopians set a new world record for planting millions of trees to help forestall climate change, the BNF is proposing to cut down thousands of trees, some several centuries old. We will not get old growth back the way things are going.

Remedy: Implement an analysis of climate change impacts from this timber sale commensurate with the critical importance of this issue. Focus on planting trees that are appropriate to new conditions and, at the least, stop cutting down any trees older than the BNF “rotation age”.

Larry Campbell

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