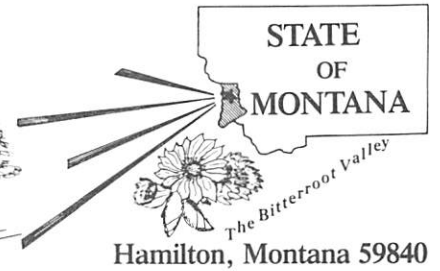
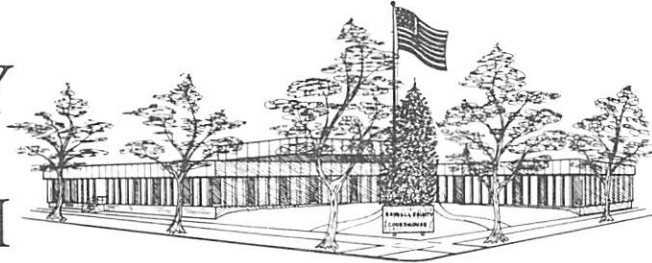


COUNTY OF RAVALLI



RAVALLI COUNTY COMMISSIONERS
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Hamilton, MT. 59840
406-375-6500
commissioners@rc.mt.gov

August 2, 2019

Objection Reviewing Officer
Building 26 Fort Missoula Road
Missoula, MT 59804

RE: Ravalli County Objection on the Gold Butterfly Project

Dear Objection Reviewing Officer,

The Board of Ravalli County Commissioners (BCC) thanks the Forest Service for the collaborative efforts in developing the Gold Butterfly Project on the Bitterroot National Forest. We look forward to working with you to mitigate concerns/impacts addressed in this letter.

The Board's objections on the Gold Butterfly Project are as follow:

Purpose and Need

Below is the Forest Service stated purpose and need for the project.

1. Improve landscape resilience to disturbances (such as insects, diseases, fires) by modifying forest structure, composition and fuels
2. Provide timber product and related jobs
3. Reduce chronic sediment sources in Willow Creek and Burnt Fork on the Bitterroot River watersheds to improve water quality and bull trout habitat in the long-term.
4. Restore or improve key habitats, such as meadows, aspen and white bark pine.

The Ravalli County Commissioners support the purpose and need of the Gold Butterfly Project and while we feel there are project improvements that should be considered, overall the proposed actions achieve the purpose and need.

Ravalli County Roads

During the comment period for the Gold Butterfly Project, Ravalli County expressed concern over the impacts to roads operated/maintained under Ravalli County's jurisdiction. Ravalli County objects to the impacts to county maintained roads from heavy equipment and logging trucks, mostly, but not limited to, the impacts to Willow Creek Road. Due to resource and financial limitations, Ravalli County would not be able to accommodate the necessary maintenance during the project, nor the rehabilitation of the road after the project is complete. Ravalli County objects to shifting financial burden of the Gold Butterfly Project to Ravalli County and believe it is contrary to current law and existing agreements.

We believe the project, as currently proposed, violates the following laws, regulations, policies:

FSM 7703.4 - Common Transportation Interests With Local Public Road Authority and Other Landowners which states in part "3. Encourage local public road authorities to bear a proportionate share of reconstruction and maintenance cost of transportation facilities over which the Forest Service does not exercise jurisdiction when the local public road authorities are unable or lack the authority to accept full responsibility. Use (FSH 1509.11, sec. 31.2) to implement these cost-sharing arrangements. Forest road agreements do not change jurisdiction over a Forest transportation facility."

FSH 31.21 states in part that the Chief may require "the user or users of a road, including purchasers of Government timber and other products, to maintain the roads in a satisfactory condition commensurate with the particular use requirements..."

The Forest Development Road Cooperative Agreement executed between Ravalli County and the Forest Service on May 26 1965 requires project agreements to reconstruct, improve and maintain road projects if the work is outside the scope of ordinary maintenance.

Schedule A Agreement – The current Schedule A agreement from 2017 requires that the BNF provide basic annual maintenance on 1.2 miles of Willow Creek Road and load rating for the bridge across the BRID ditch. The project analysis has a conflicting maintenance distance. Ravalli County objects to the project without the entire length of Willow Creek Road from the intersection with Eastside Hiway to the National Forest Boundary being added to the Schedule A and development of a Road Project Agreement and the road being returned to at least its current existing condition after the project is completed. The 2017 Schedule A Agreement limits FS operation of roadways "to that level necessary to provide for administrative access to the national forest". FSH 5409.17 ch60 sec60.5 specifically states administrative traffic "does not include commercial traffic associated with logging, such as log trucks, fallers, machine operators..."

Concerns with the increased traffic associated with the project are:

- 1) Road impacts/deterioration of both gravel and paved sections of Willow Creek Road
- 2) Impacts/solutions to load rating on Willow Creek Bridge
- 3) Traffic safety for residents and recreationalists on Willow Creek Road
- 4) Health and safety of Corvallis students at the school and utilization of Willow Creek Road for access to and from school and for cross country/track team.
- 5) Dust emissions from increased traffic

Ravalli County objects to the project without the requirement of chemical dust control. Allowing the option for watering the road for dust control will not mitigate fugitive dust particulates from the extraordinary project traffic. We would encourage the FS to monitor to PM2.5 along the residential gravel section of Willow Creek Road.

Ravalli County objects to the project without the development of a Road Project Agreement as referenced in the current Forest Development Road Cooperative Agreement (May 26, 1965) between Ravalli County and the USFS and project conditions that would mitigate impacts to the county financially and most importantly to the health, safety and welfare of the citizens.

If Ravalli County determines impacts from this project are not sufficiently mitigated, we will be forced to invoke our authority under MCA 7-14-2127(1) to at our discretion limit or forbid certain classes of traffic on Willow Creek Road.

Forest Management

Ravalli County supports active forest management within Ravalli County's jurisdictional boundaries. This management must be based on sound science and consider impacts to the local economy, cultural values and public health and safety. Forest management practices must include planting, thinning and harvesting of the forest vegetation. Removal of forest materials using mechanical and other harvesting systems will insure continued investment, employment and business opportunities in Ravalli County. We encourage a harvest level that results in a stable and sustainable volume of merchantable and non-merchantable materials being removed each year. The Bitterroot National Forest and the State of Montana Trust Lands have the capability under proactive management to achieve a healthy forest ecosystem while providing clean water, clean air, wildlife habitat, recreational opportunities, economic benefits and stability.

Ravalli County commented on the project encouraging science based vegetation management (including commercial harvest) in the Inventoried Roadless Area (IRA). The scoping document proposed vegetation management units in the IRA and was then removed in the Draft Environmental Impact Statement (DEIS). These management units were proposed to benefit White bark Pine stands and were removed based on public comment and not forest health benefits. Ravalli County objects to the project without the beneficial vegetation management units in the IRA, specifically units 87 and 88 as proposed in the scoping process.

Ravalli County supports responsible vegetation management (including commercial) in old growth stands that are affected by disease, bug infestation and over stocking. If fire were introduced in these stands under current conditions, it would result in a high mortality rate within the stand, including mortality of large, old growth trees. Ravalli County objects to converting the 14 units (17,18, 23a, 24a, 25a, 25b, 25c, 28, 30a, 30b, 30c, 30d, 53, 58a) proposed for regeneration harvest treatments in old growth to a commercial intermediate treatment. We also object to converting units 13b and 93 from regeneration harvest to non-commercial treatments.

Increased vegetation management will reduce the potential of catastrophic wildfire in the project area which impact wildlife, habitat, air and water quality, economy, and public health and safety.

We agree that our forests are in desperate need of proactive management to prevent catastrophic fires that sterilize the landscape, negatively affect water & air quality, destroy wildlife habitat, fisheries, view shed and our local economy.

Merchantable Timber Harvest Increase

Ravalli County supports project parameters that include increased volumes of merchantable timber with predictable and long-term sustainable harvest level commitment from the Bitterroot National Forest. Ravalli County submitted comments expressing support for increased commercial harvest for the Gold Butterfly Project. This commitment would provide the confidence level necessary for infrastructure investment from the private sector and create jobs and business opportunities. Converting the 16 units (17,18, 23a, 24a, 25a, 25b, 25c, 28, 30a, 30b, 30c, 30d, 53, 58a, 13b and 93) back to the original treatments and adding units 87 and 88 to the project would be beneficial to the harvest levels.

Ravalli County Natural Resource Policy


Ravalli County requested during the comment period that the Forest Service consider the “Ravalli County Natural Resource Policy” in your analysis and decision making process and object to proposed actions that are contrary to the Policy.

Conclusion

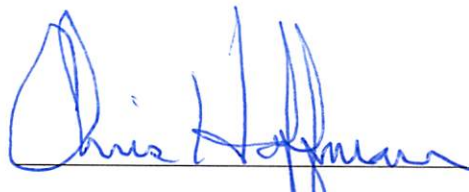
Please consider these objections as part of the official record for the Gold Butterfly Project. We look forward to being actively involved with this project’s development and analysis.

Sincerely,

Ravalli County Board of Commissioners



Jeff Burrows, Chairman



Chris Hoffman, Vice-Chair



Greg Chilcott, Member