

Objection to Soldier Butler
Lolo National Forest
Nine Mile Ranger District
Project contact Tami Paulsen

September 14, 2019

Objection sent via e-mail to:

Dear Forest Supervisor or Official in Charge of Soldier Butler Project,

I object to the project on the same grounds as my comments which I add to this objection as reference. I do not feel my comments were adequately addressed.

The project is in violation of the Endangered Species Act (ESA), NEPA, the 2012 planning rule, and the public trust.

The Nine Mile area is a critical habitat corridor for Grizzly Bear and since scoping, the Nine Mile area has been designated by the U.S. Fish & Wildlife Service as a Demographic Connectivity Area for grizzly bears, meaning occupancy by female/cub groups. This project and its myriad roads are in violation of ESA protections for the grizzly bear.

Road densities should be monitored with the moving window method and should not violate amendment 19 of the previous Flathead Forest Plan which secures grizzly habitat. Grizzly are highly sensitive to roads especially females. Roads destroy secure habitat for grizzly in violation of the ESA.

Grizzly habitat must be protected and preserved. This area is crucial for connectivity between the Northern Continental Divide Ecosystem (NCDE) and the Bitterroot Ecosystem (BE). Connectivity between subpopulations was a stipulation for delisting. Decimating this area will lessen the chance for connectivity, a genetic death sentence for the great bruin.

Lynx habitat has not been thoroughly analyzed, nor even considered in this project. The logging will reduce hiding cover for snowshoe hares, a major food source for lynx.

The public owns this land. The Forest Service (FS) holds it in trust. Promising to decommission 39 miles of roads in the area and then rebuilding them for logging is in direct violation of this trust. The public expects you to fulfill your obligations.

This project calls for 55 miles of road construction. It adds 7 miles of permanent roads and returns 39 more miles to the system. This is far from the minimum road system called for in the 2012 planning rule.

Considering ESA issues and others, this project should be fully analyzed under NEPA in an EIS.

The solution for these objections, is to go back to the drawing board and create an EIS for the project with a thorough analysis of the effects of roads and of this project on Lynx and Grizzly Bears and the minimum road system. What is the effect of this project on the forest ecosystem, carbon sequestration, water quality and water quantity? This must be analyzed thoroughly before the machines hit the ground and ruin this area.

Or better yet. Choose the no action alternative and work on decommissioning the 39 miles of roads as promised. I know you are all hard-working people who are pressured to “get the cut out”. But that is not your job. Your job is to protect the forest that you hold in trust for the public.

Thanks for considering my objection.

Michele Dieterich

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