

July 11, 2017

Tami Sabol, District Ranger
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Comments transmitted via email to: comments-northern-bitterroot-stevensville@fs.fed.us

Ms. Sabol:

Please accept into the public record these comments on the Gold Butterfly project proposal (your June 9, 2017 letter), on behalf of Friends of the Bitterroot and Alliance for the Wild Rockies.

Based upon the high level of detail in the proposal and as evidenced from the amount of information in documents already posted on the project website, the Forest Service has largely committed itself to a course of action well before engaging the public at large with the June 9 letter. But no amount of locally-based collaboration can substitute for the scoping process as required under the National Environmental Policy Act (NEPA).

The Montana Forest Restoration Committee adopted 13 Principles, written collaboratively by a diverse set of stakeholders which included the Bitterroot National Forest Supervisor along with representatives from timber and forest products industries, conservation groups, recreation interests, and others. Principle #3 states:

Use the appropriate scale of integrated analysis to prioritize and design restoration activities: **Use landscape, watershed and project level ecosystem analysis in both prioritization and design of projects** unless a compelling reason to omit a level of analysis is present. While economic feasibility is essential to project implementation, **priorities should be based on ecological considerations and not be influenced by funding projections.** (Emphases added.)

Consistent with this principle, the agency would publicize a landscape assessment so a genuine scoping process could help determine the project Purpose and Need. Instead, the Forest Service has apparently prioritized the project Purpose and Need based on appropriated funds. The Forest Service has taken Congress's ill-informed priorities for this project area, (logging and "fuel reduction") and promoted them via "collaboration" to subsidize narrow financial interests.

This spring saw the failure of the main haul road proposed for this timber sale, the Willow Creek road. The debris flow was a result of inadequate maintenance, highlighting the need for the Forest Service to recognize this issue as a highest priority. Many other roads in the area are not being adequately maintained. The Environmental Impact Statement (EIS) must demonstrate the Forest is being managed consistent with Forest-wide Management Standards J.1 ("Roads will be maintained to design standards") and J.2 ("Roads will be closed to public use if adequate road maintenance funds are not available"). The EIS must also consider how climate change will affect the road system in the project area.

We ask the Forest Service disclose the following information in the EIS:

- The deferred road maintenance backlog
- The annual road maintenance funding needs
- The annual road maintenance budget
- The capital improvement needs for existing roads
- The road density in the project area
- The number of miles of project area roads that fail to meet BMP standards or design standards

Willow Creek is listed as impaired (Water Quality Limited Segment) by Montana Department of Environmental Quality due to excessive sediment from roads. Willow Creek is occupied by bull trout habitat, listed as a threatened species under the Endangered Species Act. This species' habitat is experiencing ongoing harm by the road system the Forest Service has not properly maintained.

The EIS must analyze impacts on the streamflow regime in the Bitterroot River, which experiences low late summer flows. The EIS must consider:

- The amount of soil compaction, which reduces water infiltration;
- Forest canopy openings, which accelerate snowmelt in spring and therefore reduce late summer flows;
- Interception of groundwater by forest roads which also reduces late summer flows.

Please include in the EIS an estimate of the amount of particulate air pollution (dust) from all project area roads under each alternative, and how this affects residences and human health. Also, please disclose how the dust would affect water quality and fish habitat.

For each alternative, please disclose the itemized costs for each of the following: new system roads, new temporary roads (including tracked line machine trails and excavated skid trails), project-related road maintenance, road decommissioning, all other road-related work, sale preparation and administration, project-related weed treatment, other project mitigation, post-project monitoring, environmental analyses and reports, public meetings and field trips, publicity, consultation with other government agencies, responding to comments and objections.

Please disclose in the EIS the estimated Ravalli County road maintenance costs from county roads to be used as haul routes.

Please consider in the EIS that human ignition of wildfires far exceeds natural ignitions, and correlates with the level of motorized access.

The Forest Plan states the Forest Service was to have maintained “sufficient old growth habitat on suitable timberland to support viable populations of old growth dependent species” over the expected life of the Forest Plan, which is well past. The EIS should disclose the amount and distribution of old growth on the Forest and in the project area needed to be consistent with the quoted Objective.

Montana Fish, Wildlife and Parks documented a grizzly bear in this area about 15 years ago. The Record of Decision on Grizzly Bear Recovery in the Bitterroot Ecosystem (2000) states, “of all remaining unoccupied grizzly bear habitat in the lower 48 states, this area in the Bitterroot Mountains has the best potential for grizzly bear recovery...the Bitterroot ecosystem offers excellent potential to support a healthy population of grizzly bears and to boost long-term survival and recovery prospects for this species in the contiguous United States.” The EIS must analyze and disclose habitat conditions for grizzly bears, and the alternatives’ impacts on potential grizzly bear recovery.

In 2009 Friends of the Bitterroot along with other conservation groups petitioned the U.S. Fish & Wildlife Service to list the Northern Rockies fisher under the Endangered Species Act. The U.S. Fish & Wildlife Service determined that listing the Northern Rockies fisher “may be warranted.” A listing decision is due this September. We are concerned the increased access presented by the new road building may facilitate increased fisher trapping mortality. Please analyze project impacts to fisher in the EIS, based upon best available science.

Proposed logging, commercial or otherwise, within the Stony Mountain Inventoried Roadless Area (IRA) would degrade the Wilderness character of the area. Portions of this IRA have been included in multiple bills introduced into Congress, aimed at protecting this important wildland. It is a key link in the Sapphire crest biological corridor, which is relatively narrow, making it vulnerable to losing it function as a wildland corridor. The documented recent presence of grizzly bear and wolverine highlight the linkage value of the Stony Mountain IRA. It also has added value in this age of climate change with its cool high elevation habitat and its configuration offering north-south migration. It is especially well positioned to provide connectivity with the Northern Continental Divide and the Greater Yellowstone grizzly bear populations.

Please quantify all human-caused CO₂ emissions for each alternative. Please quantify carbon sequestration for each alternative. Please disclose how climate change has affected ecological conditions in the project area, and include an analysis of these conditions under climate change scenarios.

Please disclose in the EIS how the FS will integrate wildland fire use in the project area.

It is vital that the results of past monitoring be incorporated into this project analysis and planning. We request the following be included in the analysis:

- A list of all past projects (completed or ongoing) implemented in the proposed project area watersheds.
- A list of the monitoring commitments made in all previous NEPA documents covering the project area.
- The results of all that monitoring.
- A description of any monitoring, specified in those past project NEPA documents or the Forest Plan for proposed project area, which has yet to be gathered and/or reported.
- A summary of all monitoring done in the project area as a part of the Forest Plan monitoring and evaluation effort.

- A cumulative effects analysis which includes the results from the monitoring required by the Forest Plan.

The EIS must also include an analysis of how well those past Forest Service projects met the goals, objectives, desired conditions, etc. stated in the NEPA documents, and how well the projects conformed to forest plan standards and guidelines. The EIS must also include an analysis of how well the Purposes and Needs identified in those NEPA documents were served.

Friends of the Bitterroot supports some of the actions proposed, specifically those reducing road density and restoring aquatic habitat and watersheds, especially for bull trout. We request the Forest Service take a more comprehensive approach to restoring aquatic habitat and watersheds than is included in the proposal. Please include and fully analyze an alternative that results in a road system which is fully affordable to maintain on an annual basis, within all of the watersheds affected by the proposal. Please use expected appropriations as the yardstick to measure “affordable”, based on recent years’ funding levels.

The actions needed to reduce the road system to this affordable level need not themselves be within expected budgets. Indeed, few restoration projects proposed or implemented by the Forest Service are fully funded by appropriated dollars. Figuring out a way to fund road decommissioning would follow from a Decision to implement it. That would be a way to truly collaborate.

In analyzing such an alternative, it may turn out that some of the actions mentioned in the June 9 letter would be unnecessary or would be modified. For example, some roads proposed for maintenance or upgrading may not be affordable to maintain, or may be located where chronic sedimentation into streams persists. In such cases consideration of highest restoration priorities would require full road obliteration.

Such an alternative would avoid impacting the Stony Mountain IRA and thereby fully maintain its current corridor value to other areas for movement of wolverines, the threatened Canada lynx and grizzly bear, big game species and other wildlife species.

Such an alternative would reduce the road network in the project area watersheds consistent with the forest plan and with best available science for maintaining robust populations of bull trout.

By reducing the footprint of roads, such an alternative would reduce the spread of noxious weeds and their associated costs and environmental damage.

Such an alternative would be in compliance with the Travel Management Rule Subpart A, which requires the Forest Service to identify the forestwide minimum road system—itsself necessarily being maintainable using expected annual appropriations. This alternative would be consistent with Montana Forest Restoration Committee Principle #13, which is to “Establish and maintain a safe road and trail system that is ecologically sustainable.” This alternative would be consistent with Forest-wide Management Standards J.1 and J.2.

Such an alternative would fully decommission/obliterate the entire length of unauthorized ATV/OHV routes on national forest land in the project area to restore hydrologic functioning and soil productivity, reduce spread of noxious weeds, and promote ecosystem integrity.

Forest Plan amendments would not necessary under such an alternative, because a holistic balancing of all resources and the best available science does not support the proposed amendments. For example, the Bitterroot National Forest has been managed down to a level well below the historic range of variability for old growth, and the Forest Service has not demonstrated an active management strategy (i.e., logging old growth or logging to facilitate development of old growth) which has improved old-growth associated species' habitats over any time frame, or increased the abundance and distribution of these wildlife species' populations.

Such an alternative would not construct any new roads, including temporary or "Tracked Line Machine trail" or "excavated skid trail" (these are actually other categories of temporary roads). The Forest Service is aware that temporary roads potentially create much of the same impact as system roads.

Such an alternative would not log, mechanically treat or build roads within unroaded/roadless areas. The Scientific Assessment which was a basis for the ICBEMP EIS, along with volumes of other scientific research, point out that Wilderness and roadless areas already have the highest ecological integrity of all national forest lands.

Such an alternative would maximize the short-term sequestration of carbon in the forest, because already dangerously elevated greenhouse gases are an immediate issue that must be addressed.

Thank you for the opportunity to provide input. Please keep both our organizations on the mailing list to receive all future communications about the Gold Butterfly Project, and inform us of the opportunity to participate in the Alternative Development Workshop and any other public meetings.

Sincerely,

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