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Gold Butterfly Project Objection

E-mailed to [Appeals-northern-regional-office@fs.fed.us](mailto:Appeals-northern-regional-office@fs.fed.us)

Gold Butterfly Project Objection

Responsible Official: Matt Anderson Bitterroot National Forest Supervisor

Bitterroot National Forest

Stevensville Ranger District, District Ranger Steve Brown

Dear Objection Reviewing Officer

I am a resident of Hamilton and I spend a lot of time in the forest. I am concerned at the uptick in timber mandates and their effect on the Bitterroot National Forest and its resource of beauty and wildlife habitat that attracts people with outside incomes to this valley. I have commented on scoping, DEIS, and I have officially objected to this project. I would like to include all of those documents and included attachments as reference. I have also commented on the Supplemental Environmental Impact Statement (SEIS). I attach and include those as reference. As the issues I raised in the objection were not addressed in the SEIS, my objection still stands and I add the following objection to the SEIS and new information included in the current Draft Record of Decision (DROD).

The Gold Butterfly project area includes 55,147 acres of National Forest System (NFS) lands and is located within Ravalli County east of Corvallis, Montana in the Sapphire Mountains on the Bitterroot National Forest. The project area includes a portion of the Stony Mountain Roadless Area. No treatment activities will occur within designated areas (e.g., Research Natural Areas, Inventoried Roadless Areas, or Wilderness) or other ownerships.

Thank you for planning to bring the Willow Creek road to Best Management Practices (BMP). This is important for our fisheries, but can be completed and funded with recreation and Great American Outdoors Act (GAO) funds. I see that in order to comply with Healthy Forests Restoration Act (HFRA), you have adjusted treatments in old growth to intermediate which do not qualify as "large openings" according to Region 1. This along with splitting two areas into four smaller areas has allowed you to remove the need for permission from Region 1 for large openings. However, I am not sure if this changes the outcome. I agree with the closure of Burnt Fork Rd. at the Gold Creek campground and moving the Gold Creek trailhead to the Gold Creek campground and closing NFSR 969A at the junction with NFSR 969 (Willow Creek Rd.), moving the trailhead to the junction, and developing trailhead facilities.

I count myself lucky to have had the chance to experience wild places in the Forest. I want to preserve those places filled with wildlife and diverse flora, because they are a big part of my life. As stewards of the forest, your agency should protect the biodiversity of the forest and its wild inhabitants, so future generations can experience their magic. As population increases, we encroach even more on the places that wildlife and vegetation desperately need to survive. I object to the very large Gold Butterfly commercial logging project. We need to preserve the forest and protect its biodiversity as a higher priority than the timber mandate you are politically compelled to fill. Wild places are a priceless asset that should be cherished and protected not sold in the short term to the highest bidder. The forests you plan to "thin" will never be replaced in my lifetime, they may never regenerate considering the changing climate. Cutting down our best and already existing chance to mitigate and sequester carbon is downright criminal.

Please consider the following objection to the current DROD. Issues addressed in my previous objection and comments to this project were not addressed in the SEIS. Thus my objection still stands and I provide further discussion for some issues.

*Agency fails to disclose or fully analyze the direct, indirect and cumulative effects of changes to old growth standards and definitions in the Bitterroot National Forest (BNF) Forest Plan to wildlife.*

I addressed the lack of comparison of old growth using forest plan standards and Green et al definitions on page 1 of my SEIS comments. The DROD includes startling differences. Using the forest plan standards according to DROD, old growth is deficient in the project area and should be preserved instead of commercially logged. There is also little detail as to exactly what criteria was used for measurement and how it was measured. It is clear that little on the ground work was completed. I also want to remind you that forest plan standards say “large trees, **generally 15 per acre** greater than 20 inches diameter-breast-height (dbh) for species other than lodgepole pine and 6 inches for lodgepole pine (emphasis added).” This reflects Arno’s on the ground work that found old growth stands on the forest with an “average” of 15 trees per acre. That means some had less. I would also guess that no age data was used to assess Green et al old growth as that is time consuming and might rule out more stands. One identified old growth area on the Buckhorn project was rejected and logged because the trees averaged 130 years. The forest plan standard of a DBH limit is a much more efficient way to not only protect old growth but also mature stands necessary to comply with forest plan Goal pII-5 to, “Maintain habitat to support viable populations of wildlife species.”

Monitoring of wildlife on the forest has not happened since 2015. There is no baseline to measure effects to wildlife from the amendment or project activities. Project documentation alludes to wildlife monitoring, but linked documents do not show any of the required monitoring or the information needed for a hard look at how this amendment and project activities affect sensitive, indicator and endangered species.

40 acre stands were addressed on page 2 of my SEIS comments. Large tracts of roadless and intact old growth and mature forests are necessary to wildlife and that standard should be maintained. The standard did not preclude protecting large trees and mature stands that are not old growth within the 40 acre stand. Forest Plan direction is to use riparian areas and creatively create the connected areas of 40 acres. This preservation not only recruits new old growth, it protects mature forests that are vital to wildlife. I gave an example of the Como project (pg 2) where old growth was recognized as less than 40 acres but a 20 inch dbh limit was proposed for the area surrounding the old growth. This would allow the area to move toward a 40 acre stand. Forest Plan percentages for old growth were created knowing that the forest was deficient. They were created to spur the recruitment and preservation of old growth and to encourage connected areas in order to “Maintain habitat to support viable populations of wildlife species. (FP pII-5)”

Management area percentages were created in the Forest Plan to create sufficient old growth across the forest. Management area 2 and 3a percentages were set at 8% in order to prioritize management in those areas for wildlife and elk over timber. Management goals for those areas are to allow for timber management but focus on wildlife. Reducing the percentages to 3%, the same as Management area 1 (for timber production), is a violation of Forest Plan standards to maintain habitat for wildlife. I will also add that the SEIS made it clear that percentages of old growth would not be changed (SEIS p 4). However in Appendix B of DROD, it states the new standard will be, “About 3 percent of Management Area 1/2/3a suitable timberland, in each

third order drainage will be maintained in old growth. (p 4)” That is a change from 8% to 3% in management area 2 and 3a. I see no analysis concerning the change in project documentation.

What are the cumulative effects of Green et al being used illegally for over 20 years, and the plan to use this amendment in the Mud Creek and Bitterroot Front projects? Project documentation claims that this is only a site specific amendment and analysis is limited to the project area. In fact, agency has failed to monitor old growth with any standard since 2013 even though it is required every 2 years. In response to comments concerning monitoring in Appendix C, the agency states, “Please see Forest Plan monitoring reports posted to the Bitterroot Forest website Bitterroot National Forest - Planning (usda.gov). p 42” The link provided shows no monitoring reports available after 2015 (reports from 2009-2015 only). The most recent old growth monitoring appears to be 2013 (in the 2010-2013 Monitoring Report). In the 2013 report, FS reports old growth percentages in the Steventville district (location of the Gold Butterfly project) to be MA1—11%; MA2--5%; and MA3a—9%. The 5% in MA2 falls well short of the 8% required by the Forest Plan. In addition, the 2013 report shows old growth decreased in all three MAs between 4-10% since 2006. The 2013 reports states: “Forest Plan old growth standards need to be carefully evaluated for each 3<sup>rd</sup> order drainage where vegetation management projects are planned.” At the very least a thorough on the ground evaluation of old growth in the project area should have been completed long before the first ROD.

The site-specific amendment does not amend the standard with a replacement standard, it suspends the standards for old growth and changes the definition. It leaves no enforceable standard thus no protection of old growth in the project area. The Forest Plan is a contract that was carefully discussed and agreed upon by the public who see a need for old growth and wildlife habitat across the forest. BNF fails to take a hard look at the effects of this change to wildlife including sensitive species, indicator species, lynx, grizzly bears, wolverine and fisher in violation of the Endangered Species Act (ESA), The 2012 planning rule, NFMA, and the APA.

**Remedy: Do not amend the Forest Plan for old growth and suspend the ROD until a full analysis of effects of old growth logging on wildlife and required monitoring is completed. Design projects to increase old growth and biodiversity instead of increasing the cut.**

*Agency fails to disclose or fully analyze the direct, indirect and cumulative effects of changes to old growth standards and definitions in the Bitterroot National Forest (BNF) Forest Plan to streams and fisheries.*

USFWS Biological Opinion (BiOp) states that there is critical habitat in the project area and found the project “likely to adversely affect bull trout.” Building roads and reducing CWD in old growth as well as decreasing intact 40 acre stands of old growth/mature forests will affect bull trout and westslope cutthroat trout. It will also affect our water quantity and quality in violation of NFMA, CEQ rules, and EPA regulations.

**Remedy: Abandon this project until roads are maintained to BMPs and old growth is monitored and documented using measurable and clear criteria according to the forest plan.**

*Agency fails to disclose or fully analyze the direct, indirect and cumulative effects of changes to old growth standards and definitions in the Bitterroot National Forest (BNF) Forest Plan to climate change.*

This is a quick description of numerous studies by Beverly Law showing that logging emits much more carbon than forest fires.

<https://www.youtube.com/watch?app=desktop&v=LDdK0mvIKyg>

Most studies showing forest fires produce large amounts of carbon do not take into account the mosaic patterns of severity in forest fires or the fact that most remaining boles in severe fire areas remain standing and storing carbon for up to 20 years after a fire. The Forest Plan old growth standards protect large trees which store much more carbon than younger trees. Here is another video featuring Moomaw and his work on preserving large, old trees to mitigate climate change.

[https://www.youtube.com/watch?v=Wl9Z\\_miGBNw&t=1269s](https://www.youtube.com/watch?v=Wl9Z_miGBNw&t=1269s)

New standards do not seem to protect lodgepole pine old growth. Please explain this as there is lodgepole old growth in the project area. Studies show that lodgepole might be the future conditions found on our forest with a changing climate. If you remove lodgepole and attempt to create so-called “historical conditions” you might be systematically destroying the future of our forests. The same goes for choosing trees that you feel are susceptible to insects and disease. This is a false notion. A recent forest service study found that thinned forests lost 10% of trees in a fire while unmanaged forests lost 20% of trees. The study leaves out of the conclusion that 30% of the trees were removed in the thinning process. The thinned areas lost 40% of their trees while the unmanaged areas lost 20%. How does this effect forest carbon sequestration over time?

**Remedy: Delay decision until a full analysis of carbon released through logging and the effects of losing carbon stored in large trees on BNF has been completed.**

#### **Additional Discussion from original objection:**

*Agency fails to analyze direct, indirect and cumulative effects of project activities on water quality, water quantity, streams, fisheries, bull trout and westslope cutthroat trout.*

As I stated in my objection on page 2, and in previous comments, the project does not fully analyze effects of the project on streams and fisheries. In one instance, the two alternative are incorrectly compared. “Truckload comparisons between Alternative 2 and 3 are not correctly stated on page 11. My concern is that the sediment calculations comparing the two alternatives are based on this incorrect statement, ‘ Alternative 2 would likely result in potentially up to 50% more loads being hauled on the road system...’ Up to 50% more is incorrect it is actually as low as 50%. If you compare the high estimation of loads for alt 3 (4000) to the low estimation of loads for alt 2 (6000) you get 50 % more loads. But if you compare the low to the low (3000-6000) it is double. More than that if you compare the low of 3 (3000) to the high of 2 (7000). My concern is that the sediment calculations comparing the two alternatives are based on 50% more truckloads creating a large discrepancy in the sediment information provided to the public comparing the two alternatives. (p 2)” This is misleading and this concern was not addressed in the FEIS or the SEIS nor was analysis changed.

On page 4 of my objection I state, “FMP goal is to “maintain fish habitat by minimizing the miles of road needed for management and to require high standards for road maintenance” II-5 is not

consistent with the scope of the project. The timber sale will build 40 miles of new road with no promise or budget to maintain those roads or the existing roads in the project area. Sediment increase during the project is 789%.” The project is reconstructing already reclaimed roads and not considering them new roads but in the same breath is counting the reduction of reclaimed roads as a reduction in roads. This is misleading to the public and puts our fisheries and clean water supply in jeopardy.

Project documentation continues to promote log hauling over fire disturbance for bull trout even though they should expect high severity fire driven by weather will happen regardless of project activities. I add the following information to my objection refuting the idea that bull trout can adapt better to logging and roads than fire. After the Bitterroot fires of 2000, debris flows immediately after the fire were troublesome but in the long term, the effects were positive. Studies done a decade after the fire showed native fish populations increasing and non-native fish declining especially in areas of high intensity fire as soon as three years after the fire (Clancy et al 2012 presentation). Rieman and Clayton 1997 also offer the following information:

a) Although wildfires may create important changes in watershed processes often considered harmful for fish or fish habitats, the spatial and temporal nature of disturbance is important. Fire and the associated hydrologic effects can be characterized as “pulsed” disturbances (*sensu* Yount and Niemi 1990) as opposed to the more chronic or “press” effects linked to permanent road networks. Species such as bull trout and redband trout appear to have been well adapted to such pulsed disturbance. The population characteristics that provide for resilience in the face of such events, however, likely depend on large, well-connected, and spatially complex habitats that can be lost through chronic effects of other management. Critical elements to resilience and persistence of many populations for these and similar species will be maintaining and restoring complex habitats across a network of streams and watersheds. Intensive land management could make that a difficult job.

A paper by the Western Montana Level 1 Bull trout Team (Riggers et al 2001) states:

a) Habitat conditions are another factor that has changed significantly. In general, fish habitat quality is much less diverse and complex than historic, and native fish populations are therefore less fit and less resilient to watershed disturbances. Roads, more than any other factor, are responsible for the majority of stream habitat degradation on National Forest Lands in this area (USDA 1997). Historically roads were not present in watersheds and did not affect hydrologic or erosional patterns. Now, however, extensive road networks in many of our watersheds contribute chronic sediment inputs to stream systems and these effects are exacerbated when fires remove the vegetation that filters road runoff.

b) ... the real risk to fisheries is not the direct effects of fire itself, but rather the existing condition of our watersheds, fish communities, and stream networks, and the impacts we impart as a result of fighting fires. There, attempting to reduce fire risk as a way to reduce risks to native fish populations is really subverting the issues. If we are sincere about wanting to reduce risks to fisheries associated with future fires, we ought to be removing barriers, reducing road densities, reducing exotic fish populations, and re-assessing how we fight fires. At the same time, we should recognize the vital role that fires play in stream

systems and attempt to get to a point where we can let fire play a more natural role in these ecosystems.

c) ...we believe, in most cases, proposed projects that involve large-scale thinning, construction of large fuel breaks, or salvage logging as tools to reduce fuel loadings with the intent of reducing negative effects to watersheds and the aquatic ecosystem are largely unsubstantiated. Post-fire activities such as these that increase the probability of chronic sediment inputs to aquatic systems pose far greater threats to both salmonid and amphibian populations and aquatic ecosystem integrity than do fires and other natural events that may be associated with undesired forest stand condition (Frissell and Bayles 1996).

The Flathead Lake Biological Station has been studying the aquatic environment in the Crown of the Continent ecosystem for decades. Hauer et al (2007) found that:

“Streams of watersheds with logging have increased nutrient loading, first as SRP and NO<sub>3</sub>, which is rapidly taken up by stream periphyton. This leads to increased algal growth that is directly correlated with the quantity of logging within the watershed. The increased periphyton increases particulate organic matter in transport as the algal biomass is sloughed into the stream. We observed this as increased TP and TN in logged watershed streams. Other studies in the CCE have shown that increased sediment loading and an incorporation of fines into spawning gravel, especially during the summer and fall base flow period, has a dramatic effect on the success of spawning by bull trout (*Salvelinus confluentus*). Experiments have shown that as the percentage of fines increases from 20% to 40% there is >80% decrease in successful fry emergence.”

Hauer, et al. (1999) also found that bull trout streams in wilderness habitats had consistent ratios of large to small and attached to unattached large woody debris. However, bull trout streams in watersheds with logging activity had substantial variation in these ratios. They identified logging as creating the most substantive change in stream habitats.

“The implications of this study for forest managers are twofold: (i) with riparian logging comes increased unpredictability in the frequency of size, attachment, and stability of the LWD and (ii) maintaining the appropriate ratios of size frequency, orientation, and bank attachment, as well as rate of delivery, storage, and transport of LWD to streams, is essential to maintaining historic LWD characteristics and dynamics. Our data suggest that exclusion of logging from riparian zones may be necessary to maintain natural stream morphology and habitat features. Likewise, careful upland management is also necessary to prevent cumulative effects that result in altered water flow regimes and sediment delivery regimes. While not specifically evaluated in this study, in general, it appears that patterns of upland logging space and time may have cumulative effects that could additionally alter the balance of LWD delivery, storage, and transport in fluvial systems. These issues will be critical for forest managers attempting to prevent future detrimental environmental change or setting restoration goals for degraded bull trout spawning streams.”

Finally bull trout are especially sensitive to stream temperatures. A new study by Kirk et al 2021 shows that logging and deforestation increases stream temperatures. It states:

“..., we found that streams with intact forest cover at the watershed level had low thermal sensitivities, which slowed rates of projected warming. As a result, streams with forested

watersheds were predicted to have smaller declines in thermal integrity and lower extirpation probabilities of brook trout. Additionally, non-native brown trout were not predicted to expand distributions under projected warming, suggesting minimal synergistic effects between non-native species and climate change. Forest cover buffers headwater streams from the effects of global change, similar to how groundwater inputs reduce the rate of stream warming. Forest restoration at riparian and watershed levels should help mitigate thermal-induced degradation of cold-water aquatic resources.”

The USFWS biological opinion on the Travel Plan, expected certain roads to be decommissioned as per USFWS direction. Some were to be handled during project implementation. There is no information as to any roads in the project area that are slated for change in compliance with this mandate. Nor has a minimum road system been analyzed as required.

**Remedy: Create and fund a project to improve existing roads in the project area and monitor stream temperatures, bull trout, and westslope trout in order to establish a baseline of conditions with BMPs prior to commercial logging.**

*Project fails to fully analyze direct, indirect, and cumulative effects of project activities on rare and endangered plants.*

I discuss this in my comments and objection page 9. It seems some areas were changed due to rare plant surveys. Thank you for doing this, but commercial logging, road building and prescribed burning in the spring destroy rare plants. Please share a full inventory of rare plants in the project area showing where, when and how often surveys were completed. The monitoring of rare plants on the forest is not up to date. No monitoring has been completed since 2015. Without monitoring, there is no baseline to analyze effects or compare surveys completed in the project area.

**Remedy: Withdraw project decision and monitor BNF for rare plants to establish a baseline and analyze effects of future projects on these species.**

*Road reconstruction of FS3111 violates streamside management zone SMZ rules.*

This road will be reconstructed and used “only for administrative purposes.” Road violations are rampant in the project area and this “closed” road will not be an exception. Its construction is in violation of SMZ rules. BNF did this in the Darby Lumber Lands II project along Harlan creek. Since BNF has shown that it cannot follow SMZ regulations, the road should be abandoned.

**Remedy: Decommission this road and do not consider its reconstruction in the future.**

**New Information:**

*The finding that grizzly bears are “not present” in the project area fails to follow methodology established by USFWS and thus the project fails to analyze direct, indirect and cumulative effects of project activities on grizzly bears.*

My objection to project activities and their effects on grizzly bears still stands. I would add that the recent USFWS BiOp on the Forest Plan found it to “adversely affect grizzly bears.” This BiOp did not include and therefore did not assess the old growth amendments effect on grizzly bears.



In a recent IGBC meeting USFWS established and presented methodology for how to determine whether grizzly bears may be present. All HUCs with verified sightings of grizzly bears and surrounding HUCs are determined to be “may be present.” These determinations are to be updated each year so current determination is outdated. The grizzly bear found on the Stevensville golf course in 2018 was in the same HUC as the Gold Butterfly Project. Nothing is more clear, yet somehow the project area is no longer considered an area where grizzlies may be present. How is that possible with continued verified sightings in the Burnt Fork over the years? There is the suspicion after recent DNA hair snag monitoring that a female grizzly resides in the Sapphire Range. Project documentation explains that the golf course bear was a transient. These are just the bears to be encouraged in this connectivity area. Now that there might be a female in the area, male transients who could also be residents should be encouraged. USFWS five year review of grizzly bear status found that connectivity is key to the long term recovery of the bear. Core habitat must be inventoried, and Grizzly Bear Management Units must be established throughout BNF lands.

The project area includes core habitat for grizzlies, prime denning habitat, and large intact roadless areas inventoried and otherwise where grizzlies can thrive. The project proposes road building on the same steep slopes where grizzlies den. Some logging units even overlap and edge areas of prime and medium level denning habitat. Clearly the project is in violation of the ESA and the determination of “not present” in the area is arbitrary and capricious.

**Remedy: Determine grizzly bear presence using established methodology and abandon the project until such time as grizzly bear effects are fully analyzed, core habitat is inventoried, Grizzly Bear Management Units are established, and the project is modified to eliminate threats to the recovery of grizzly bears.**

*A recent community risk assessment that calls the GB project area “high risk” does not reflect the best available science nor did it follow full public process.*

DROD documentation claims the new community risk assessment plan describes all areas 1.5 miles from the Forest Service boundary as high risk for fire. It does not take into account recent thinning work. Former BNF supervisor Julie King stated in the Ravalli Republic that after the Westside project, all fire risk work will have been completed on the forest. None of these projects have reduced the risk of fire according to the new assessment. The assessment does not analyze recent fire activity either. This is not based in science and no scientists were on the citizen council involved in the plan. And the plan was never offered to the public or to independent scientists for review.

There are no communities as described in HFRA regulations near the project area. Only a few homes are near the Gold Butterfly area and they are upwind and downhill from potential fire activity. This is not a high risk area and using funds to commercially log there is a waste of taxpayer dollars. As recent court cases have found, you cannot make a place a high risk area just by saying so. By HFRA definitions, the area is not high risk and a few houses do not qualify as a community. The project does not qualify for funding under HFRA especially when considering its proposed decimation of old growth.

**Remedy: Use the legal definition of communities at risk under HFRA and do not recognize the recent community assessment plan. Be more conservative with tax dollars. If you want to protect communities, get behind a program that hardens homes to fire risk.**



Thank you for considering this objection. Please abandon this deleterious project. Timber mandates are not science based. They are politically based. After banning logging in the Tongass, the mandates remained static. How can that be possible after removing one of the largest forests in our country from timber production? Time is running out for our future and future generations. We must preserve forests for carbon storage and sequestration.

Sincerely,

Michele Dieterich