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**File Code:** 1570  
**Date:** February 16, 2022

Dear Objector;

This letter is in response to objections filed on the Gold Butterfly Supplemental Environmental Impact Statement (SEIS) and Draft Record of Decision released by Matt Anderson, Forest Supervisor of the Bitterroot National Forest. I have read your objections and reviewed the project record. My review of your objection was conducted in accordance with the administrative review procedures found at 36 CFR 218, Subparts A and B.

### **ADMINISTRATIVE REVIEW PROCESS**

The regulations at 36 CFR 218.8 provide for a pre-decisional administrative review process in which the objector provides sufficient narrative description of the project, specific issues related to the project, and suggested remedies that would resolve the objections. In my review I considered issues including compliance with NEPA and NFMA, air quality, aquatic species, water quality, rare plants, climate change and carbon stocks, economics, fuels and fire, old growth, vegetation management, roads, travel management, and wildlife including Threatened, Endangered and Sensitive species.

### **OBJECTION RESOLUTION MEETING**

I conducted a resolution meeting on Friday, February 11, 2022, that was attended by the following objectors.

- Tom Partin, American Forest Resource Council
- Michael Hoyt
- Jeff Lonn
- Michele Dieterich
- Skip Kowalski of Bitterroot Forest Collaborative
- Gail and Stephen Goheen
- Larry Campbell
- Diane Olhoeft
- Jim Miller of Friends of the Bitterroot



- Steve Kimball of Montana Department of Natural Resources and Conservation
- Jeff Burrows of Ravalli County

We discussed a number of specific issues related to the proposed action including climate change, old growth, grizzly bears, forest plan standards and amendments, roads, air quality, and the Wildland Urban Interface. We also heard support for the proposed action from several objectors. Matt Anderson and District Ranger Steve Brown were able to provide information and acknowledge feedback from objectors. Although no resolutions were reached, I very much appreciate hearing from objectors who were able to attend.

## **RESPONSE TO OBJECTIONS**

As specified at 36 CFR 218.11(b), this is my response to your objections to the Supplemental Environmental Impact Statement, draft Record of Decision, and project record. The responsible official provided adequate analysis of the issues raised and provided acceptable documentation of compliance with applicable law, regulation, and policy.

As a result of my review of objections and the resolution meeting, I am instructing the responsible official to complete the following before signing the decision.

1. Wildland Urban Interface Boundary – clarify the description and add a map that clearly displays the boundary applied to the proposed action.
2. Mass Wasting Potential - Update the project record to acknowledge the 2017 observed mass wasting event, the conditions under which it occurred, and evaluate the likelihood of such an event occurring again.
3. Elk Analysis - Clarify how elk population trends are used in the analysis of effects to elk from the proposed action including forest plan amendments for elk habitat effectiveness and thermal cover.
4. Elk Analysis – Explain how the Coordinating Elk and Timber Management Report was considered in analysis of effects to elk.
5. Wolverine – Clarify whether there are reasonably foreseeable future actions in the cumulative effects analysis area for wolverines.

In addition to the instructions above, the responsible official will evaluate the feasibility of monitoring air borne particulate matter on roads. The responsible official also acknowledges an editing error in Appendix B of the draft Record of Decision relating to the amount of old growth. The correct numbers are reflected in the FSEIS. Appendix B to the final Record of Decision will have the corrected percentages.

## **CONCLUSION**

Upon incorporation of these instructions the responsible official may sign the Decision Notice for this project. My review constitutes the final administrative determination of the Department

of Agriculture; no further review from any other Forest Service or Department of Agriculture official of my written response to your objection is available [36 CFR 218.11(b)(2)].

Sincerely,

KEITH LANNOM  
Deputy Regional Forester

cc: Matthew Anderson, Stephen Brown, Moira McKelvey, Michelle Norton, Barbara Cisneros, Olga Troxel,