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The Bitterroot Forest Collaborative, or BFC, (formerly the Bitterroot Restoration Committee), thanks you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Gold Butterfly Project. Our collaborative is committed to science-based management of our National Forests and public lands. Maintaining or restoring properly functioning ecosystems is our primary objective; market factors, such as forest products and jobs, are beneficial secondary outcomes of science-based natural resource management.

BFC has been involved in the Gold Butterfly project proposal, in its various iterations, since its inception. In fact, our group initially recommended implementing a forest restoration project in the Butterfly Creek area years ago. While we supported aspects of the project, we were not in concurrence and filed an Objection on July 19th, 2019. Our Objection was based primarily on: (1) the potential adverse impacts of roads on streams and wildlife security, (2) the impacts of timber harvest in old-growth habitat, and (3) insufficient monitoring needed to adequately evaluate potential impacts from roads and timber harvest on wildlife habitat, especially on old-growth forests.

As the DSEIS deals largely with adaptive management, particularly of old-growth habitat on the Bitterroot National Forest, we are focusing our current comments on relevant issues of old-growth habitat features and monitoring and on larger-scale (both spatial and temporal) views. Our comments are based primarily on our earlier Objection to the Gold Butterfly project and on our collaborative's recently approved Position Statement on Special Habitats, Habitat Features, and Habitat Conditions Position Statement, hereafter referred to as our Special Habitats Position Statement (see attached). We hope that you will give our comments strong consideration when finalizing the SEIS and during all phases of project implementation.

OLD-GROWTH HABITAT

Throughout our Special Habitats Position Statement, we devote considerable attention to old growth. The following excerpt from the Background section discusses the importance of old-growth forests:

Because special habitats support disproportionately greater species richness or provide the only habitat suitable for obligate species, special habitats need special consideration in managed landscapes. Depending on the specific circumstances, different types of management may be necessary. Maintaining appropriate representation of old-growth forests, for example, may need complete protection in some cases, recruitment of replacement habitat in other cases, silvicultural treatment to maintain old-growth conditions (tree diameter, stand

density, composition, and structure in ponderosa pine habitat, for example) in other situations and actions such as treating adjacent timber stands in a manner that helps reduce the risk of losing existing old-growth to wildfire in yet others. Similarly, snag retention in timber sale areas or the actual creation of snags may be necessary to meet Forest Plan standards and provide sufficient snags to meet the needs of cavity nesters.

Providing sufficient and quality old growth habitat remains a contentious issue on the Bitterroot National Forest and therefore merits disproportionately greater discussion and consideration from other special habitats. Old growth forests are ecosystems distinguished by old trees and related structural attributes such as snags, down woody material, and multiple canopy layers. According to Principle 6 in Hessburg et. al. (2015): "Widely distributed large, old trees provide a critical backbone to dry pine and dry to mesic mixed-conifer forest landscapes."

Large, old trees store disproportionate amounts of carbon, as carbon storage dramatically increases with size (dbh) (Mildrexler et al, 2020; Stephenson et al, 2014). With future climate crises probable, retaining large, old trees will not only help mitigate or buffer climate change, but will benefit ecosystems in other ways through their biodiversity and resilience to fire, disease, and drought.

Certain species on the Bitterroot Forest are associated with mature forest habitats or old growth. These animals require habitat with structural components such as snags, down logs, and large, old trees for cover, denning, food, or nesting. Examples include fisher, flammulated owls, pileated woodpeckers, and pine marten, the latter two being old growth management indicator species.

Reflecting the importance discussed above, many of our Position Statement's Recommendations focus on old-growth habitat, in Gold Butterfly and other BNF projects:

*To the extent possible, retain all or nearly all old/large trees. Retain and expand on existing relict trees, old forests, and post-disturbance large snags and down logs in these types.
*Forest managers should protect existing old-growth habitat and manage vegetation to accelerate the replacement of ecologically functioning old growth where there is a deficit of existing old growth or where old - growth habitat is at high risk of being lost to normal forest succession and/or wildfire.
*Management actions in old growth should strive towards preserving secondary old growth structural components such as snags and down logs, characteristics that crucially add to the complexity and functionality of old growth and for which many old growth-associated animals rely on for denning, nesting, or cover.
*Any prescriptive vegetation management in old growth should not decrease old growth percentages in any 3rd order drainages.
OLD GROWTH CRITERIA

In both the Background and Recommendation sections of our Special Habitat Position Statement, we address Green et al., the standard the DSEIS proposes to use in place of the Forest Plan standard for old growth.

From the Background section:

For our region Green et. al. (1992) has helped define minimum screening criteria of different tree species for old growth. The principal criteria are age, size (dbh), and # qualifying trees/acre. As an example, for our western Montana region, ponderosa pine, Douglas-fir, and western larch have a 170 year minimum and 8 or more trees per acre of 21" dbh or greater. Green et al (1992) examined 4847 old growth plots of these species, on warm to warm, dry environments and found an average of 17 trees per acre that met the old growth criteria, more than double the minimum criteria. Fiedler et al (2007b) state that "old-growth functions increase as numbers of large trees, snags, and downed logs increase," again suggesting more is better.

We also address the use of Green et al. in our Recommendations:

*The Forest should justify the rationale for entering any old-growth habitat and avoid designated "old growth" except where absolutely necessary.
* Definitions for old growth in Green et al. should only be used when recruiting stands to meet minimum old-growth acreage requirements.
It follows that Green et al. should not be used to bring existing old-growth stands down to eight old-growth trees per acre, Green's minimum.

MONITORING

We are pleased that the DSEIS frequently mentions monitoring, often in the context of arguing that the old-growth standards in Green et al. are superior to those in the 1987 Forest Plan. The document repeatedly says that standards in Green et al. are based on actual data taken from field plots and are much easier to monitor than those in the Forest Plan.

Monitoring has always been recommended in our comments on BNF projects. For example, in our Objection Comment on the Gold Butterfly FEIS in July of 2019, one of our recommendations focused on monitoring:

We would like the Forest to elaborate on how it plans to monitor activities associated with the implementation of the GB project. Based on past experience, some members of the Committee are not convinced that stand treatments will be implemented exactly as prescribed, that assumptions related to maintaining OG characteristics are completely valid and, even if resulting stand conditions meet definitions of Green et al., they will continue to function as OG habitat.

In addition, BFC's Position Statement on Special Habitats includes the following recommendation on monitoring:

The Forest should provide a greater emphasis and follow-up on monitoring. Effective monitoring is essential for tracking trends in the amount and quality or rare and declining habitats, especially old-growth forests. The Bitterroot Forest should initiate an aggressive "rare habitat monitoring program" that tracks the abundance and distribution of rare habitats through time and supplements such monitoring with statistically valid field verification.

In the draft SEIS, the BNF says:
Attributes that need to be tracked over time to meet monitoring objectives are:
*Does the stand still meet Northern Region old growth definitions as defined in Green et al. after treatment?
a. Does it continue to maintain these characteristics?
b. How does the vigor of the old growth stand trees change over time?
*Did the activity reduce potential for stand replacing fire? How long was it reduced?
*Did the activity reduce the susceptibility to bark beetles? How long was it reduced?
*Did vegetation respond as desired?
*How do the treatment areas compare to unmanaged areas over time (i.e. controls)?

While we agree that it is important to monitor all the listed attributes, we particularly support the last item that says monitoring will compare treated to untreated areas. Again, from our Objection Comment Recommendations:

With the objective of learning from this project, we would have liked to have seen more of Alternative 3 (no harvest in OG and no new roads) incorporated into the selected alternative. This would have provided the opportunity to compare habitat conditions between treated and untreated stands, which could go a long way in substantiating or refuting the Agency's ability to create OG habitat through timber harvest.

Clearly, adaptive management cannot occur unless the success or shortcomings of treatment can be assessed. Control stands will make assessment far easier and more accurate.

The Forest Service has not always been successful in completing planned monitoring activities. Although we understand this is often due to a lack of funds, we would like to see a detailed plan for monitoring that includes treated and untreated old-growth stands in the Gold Butterfly Project area. As any project should not be considered complete until planned monitoring has been accomplished, we recommend that the Forest prioritize funding for monitoring the impacts on old growth from implementation of the Gold Butterfly project.

Cumulative Effects

The section in the DSEIS on cumulative effects is unclear. For example, you focus on impacts from the distant Mud Creek and Bitterroot Front Projects while you omit discussion of current and future projects that are geographically closer to Gold Butterfly, such as the recently proposed Eastside Project. The Eastside Projects proposes nearly 97,000 acres of prescribed burning, which has a tremendous potential to locally impact wildlife habitat for species such as deer, elk, and Black-backed Woodpeckers, but the project is not mentioned.

We recommend that you conduct a comprehensive cumulative effects analysis on impacts to wildlife and old-growth habitat for this and any other large-scale projects you propose in the future. These analyses should address impacts at local and broader spatial scale through time.

Summary and Conclusion

BFC appreciates the opportunity to comment on the Gold Butterfly DSEIS. We are especially pleased that you have helped clarify the definition of old-growth habitat referenced in Green et al. The clarification will improve future discussions related to old-growth habitat. While Green et al. may be the best available science for identifying old growth, whether it is beneficial or detrimental to this special habitat depends on ensuing management activities, as our comments above, under Old Growth Criteria, suggest. We are also pleased that you have acknowledged the need for monitoring and that you have identified a number of specific questions that can be addressed through monitoring.

We recognize that funding for monitoring continues to be a problem; however, feedback is an essential function in any adaptive management protocol. In particular, adequate monitoring is absolutely necessary to verify many of the assumptions regarding the Forest's ability to manage vegetation to provide favorable special habitat conditions, especially old growth. From our perspective, monitoring the impacts of projects of this temporal and spatial scale is critical and should be a very high priority for the Forest. Projects of this magnitude should not be initiated unless adequate monitoring funds are available.

We hope you take our comments as constructive and will give them strong consideration as you move forward with the Gold Butterfly project. We intend to remain involved and look forward to working with you on this and future projects on the Bitterroot Forest and make more specific site-specific recommendations during implementation.

Thank you again for the opportunity to comment.