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Comments: comment letter attached

August 8, 2021

Matt Anderson, Forest Supervisor

Bitterroot National Forest

1801 N. First St.

Hamilton, MT 59840

Re: Montana Department of Resources and Conservation, Comments on Gold Butterfly Project Draft Supplemental Environmental Impact Statement

Dear Mr. Anderson,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Gold Butterfly Project. The Montana Department of Natural Resources (DNRC) has fire protection interests and manages State Trust Lands in the area. Our agencies share the common goals of reducing fire risk and improving forest health in Montana's forest landscapes. The Gold Butterfly Project presents an important opportunity to return fire and increase vegetation diversity over a large landscape on the Bitterroot National Forest. Past fire suppression and management has resulted in dense, homogenous stands in warm-dry forest types that are currently at high risk to uncharacteristic wildfire and insect and disease outbreaks. This project would help return this landscape to a disturbance regime resembling historic conditions and greatly improve forest resiliency and habitat. Most of the project area is within Priority Areas for Focused Attention in the Montana Forest Action Plan due to wildfire risk and forest health issues. DNRC shares interest in improving conditions and reducing risk in this area and strongly supports this project.

DNRC supports the Purpose and Need for the Gold Butterfly project stated in the 2019 EIS: improve landscape resilience to disturbances (insect and disease and wildfire) by modifying forest structure and composition; provide timber products and related jobs; reduce chronic sediment sources in the Willow Creek watershed to improve water quality and bull trout habitat in the long term; and restore or improve key habitats such as meadows, aspen, and whitebark pine.

DNRC supports the Preferred Alternative in the 2019 Final EIS. The treatments proposed will implement vegetation and fuels treatments in the planning area to improve habitat, reduce potential for uncharacteristic wildfires, enable safe and successful fire suppression, reduce wildfire risk to communities, and restore the ecological role of fire on the landscape.

DNRC supports the Purpose and Need stated in the DSEIS: Propose a project-specific amendment to the 1987 Bitterroot National Forest Forest Plan to include the Green et al (1992, errata 2011) as direction and criteria for the definition of old growth. DNRC supports the project-specific amendment for this project. The latest update of Green et al is the Best Science regarding old growth and it provides measurable criteria and more relevant direction than the 1987 Forest Plan standards.

In implementing this project consider how the treatments will be coordinated with treatments on state and private lands in the area. DNRC has programs to support work on private lands as well as a Good Neighbor Authority agreement that could potentially provide capacity to assist with implementation of this project.

It is important to ensure the treatments retain old growth characteristics in the old growth stands as per the standards in Green et al. If, during implementation, it is found that treating any stand treatments would bring substantial risk of reducing old growth characteristics below those standards, those stand treatments should be modified or dropped.

DNRC is committed to continuing a positive working relationship with the Bitterroot National Forest, specifically relating to landscape resiliency, wildfire response, community protection, and sustainable forest management. By working together, we can more effectively work towards an "all lands" approach to forest and watershed management and restoration benefiting both agencies' missions.

Sincerely,

Mike O'Herron
Area Manager, Southwestern Land Office
Montana Department of Natural Resources and Conservation

Cc: Thayer Jacques, Unit Forester; Stephen Kimball, Local Government Forest Advisor