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Organization:

Title:

Comments:

Re: comments on Gold Butterfly draft SEIS

"Major conclusions include:

? This plan amendment is needed to align the Forest Plan criteria and definition for old growth with the best available scientific information for old growth, Green et al. (1992, errata 2011)."

It is encouraging to hear the BNF wants to update management with best available science. I suspect this rare case is due to the possibility of getting more old growth trees cut out.

"? This plan amendment is also needed to change Management Area direction related to minimum stand size to classify stands smaller than 40 acres as old growth to better align with Forest Service handbook direction and to protect smaller stands of old growth that are ecologically important."

This change in minimum stand size seems to be necessitated by the fact that old growth has been so over-exploited that there are too few stands that fit the old MA direction. The crumbs keep getting smaller.

"? The Forest Plan definition of old growth is unclear for several reasons including not based on the variability found across different habitat types, immeasurable criteria, and no minimum age requirement among other reasons as described in this document."

This displays another old growth redefinition angle designed to get more cut out.

"? The Forest Plan criteria for old growth is not easily measured and therefore is inappropriate as a monitoring tool; the Bitterroot has no way of knowing how much forest would qualify as old growth using the 1987 Forest Plan criteria. Conversely, the Bitterroot has been using Green et al. criteria to inventory and monitor old growth since this best science became available. Monitoring informs us whether we are meeting Forest Plan goals and desired conditions."

This is an admission that the BNF has been breaking the law for many years. You could choose to err on the side of conservative conservation of old growth, but choose to keep squeezing exploitation of old growth to the maximum allowable and when that is reached you increase what is allowable.

"? The habitat type specific definitions of old growth, as well as the removal of the 40-acre minimum size stand is more inclusive and results in more forest correctly identified and managed as old growth."

You are assuming the conclusion of correctness prior to analysis because it serves your pre-analysis desired condition of getting more cut out.

"? This project-specific amendment would not affect the amount of habitat available for species such as pileated woodpeckers or marten that are associated with habitat components that are most common in mature or over-mature forests."

How can this be? The statement defies logic. Every old growth tree removed is a loss of potential habitat for the species named. The total amount may only be reduced in small increments, but it is gone when hauled out of the forest.

"When a plan amendment is made together with, and only applies to, a project or activity decision, the analysis prepared for the project or activity may serve as the documentation of the preliminary identification of the need to change the plan (§ 219.13(b)(1))." (p.3)

Yet you have been and will be using this amendment across the entire BNF. It is a past time to prepare a Forest Plan Amendment. The use of "project specific" amendments has been abused without limit. It may take longer to prepare a forest-wide amendment, but that would be nothing compared to the time to replace old growth stands.

I support:

"Alternative 1 - No Action

Under the no action alternative, current management plans would continue to guide

management of the project area. No project-specific forest plan amendment would be implemented to accomplish project goals. The Bitterroot Forest Plan direction that is currently in the plan would persist and no changes would be made to update the old growth management direction to be aligned with best available scientific information."

Sincerely,
Larry Campbell