

Ravalli County Collaborative

Ravalli County Montana

215 S. 4TH STREET SUITE A
HAMILTON, MT 59840

July 8, 2019

Objection Reviewing Officer
Building 26 Fort Missoula Rd
Missoula, MT 59804

RE: Ravalli County Collaborative Objection on the Gold Butterfly Project

The RCC would like to thank the Forest Service for developing the Gold Butterfly project and considering our previous comment letter submitted July 9, 2018. We believe this project is a positive contribution to Ravalli County because the project area is in immediate need of vegetation management to address hazardous fuel conditions and insect and disease threats to forest health.

We support the selected Alternative in the Draft Record of Decision and would object to substantial modification to the scope and scale of this alternative.

However, we request that the issues raised in our attached comment letter be considered in the final decision.

Sincerely,



Steve Schmidt
Co-Chair



Larry Jakub
Co-Chair

Ravalli County Collaborative

Ravalli County Montana

215 S. 4TH STREET SUITE A
HAMILTON, MT 59840

COPY

DATE: July 09, 2018

TO: comments-northern-bitterroot-stevensville@fs.fed.us

RE: DEIS for the Gold Butterfly project

To Whom It May Concern:

The Ravalli County Collaborative (RCC) has reviewed the DEIS for the Gold Butterfly project and offer the following comments for your consideration in preparing the final EIS.

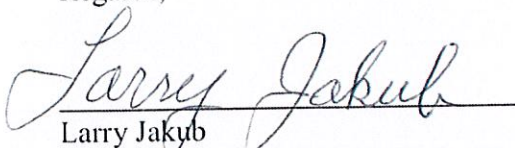
1. The RCC agrees with the description of the problem and the need for treatment expressed within the DEIS.
2. The RCC requests that the economic analysis include a presentation of the additional volume and acres harvested over and above that required for the forest health objective. The public deserves to know the "cost" of restoration treatments. The RCC also recognizes the future costs associated with not doing this project.
3. The RCC recommends finding a way to minimize increased sediment to streams in the project area, ensuring effective dust abatement on roads near streams, and monitoring of sedimentation, bull trout REDD count and water temperature. The terms and conditions set forth in the biological opinion issued by the Fish and Wildlife Service need to be addressed within the final DEIS.
4. The RCC is concerned that both habitat and critical habitat areas for Wolverine, Lynx, Fisher and Pine Martin share many areas where treatment of the forest or commercial logging overlap and shall have a substantial impact to various degrees on these declining and or struggling wildlife populations. Protection of Old Growth conditions is recommended.
5. The RCC believes that some treatment would be beneficial in stands that have old growth designations where diseases, over stocking, and lack of fire have created dense understories encroaching on larger old growth characteristic trees. These stands need treatment.
6. The RCC is concerned about the implementation of the prescribed "improvement cuts" planned for about 40% of the acres to be commercially treated. Unless properly marked and monitored, the dangers of "high grading", "pickling", or "cull tree release" become significant.
7. The RCC agrees that some road construction (new or temporary) that replaces high hazard roads would be beneficial. However, the RCC generally agrees that roadless areas should remain so.
8. The RCC recommends more efforts to enhance the recreational infrastructure in the long-term. The RCC feels that recreation is almost treated in the DEIS as a nuisance to be mitigated rather than a resource to be enhanced. We would like to see recreation viewed as an opportunity resource similar to timber, fisheries and wildlife.

9. The RCC recommends that the FEIS clearly explain the claim that Ravalli County is a "timber dependent community".

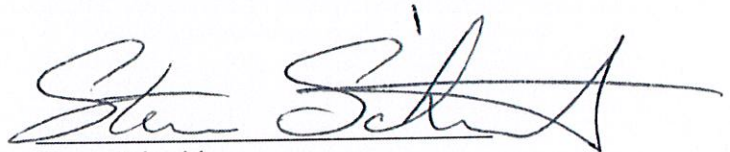
RCC RECOMMENDATION:

The RCC generally supports the Gold-Butterfly project with its stated purpose and need. However, the RCC believes a better balance of purpose and need for on-the-ground work needs to be addressed by considering the aforementioned comments. Therefore, the RCC cannot support any of the alternatives currently described in the DEIS. A new action alternative in the FEIS addressing the above comments would be preferred.

Regards,



Larry Jakub
Ravalli County Collaborative Co-Chair
larry.jakub777@gmail.com



Steve Schmidt
Ravalli County Collaborative Co-Chair
wildlander@hotmail.com

Cc:

Bitterroot National Forest
Attn: Julie K. King, Forest Supervisor
1801 N. 1st Street
Hamilton, MT 59840

Bitterroot National Forest
Attn: Jeff Shearer, Interdisciplinary Team Leader
1801 N. 1st Street
Hamilton, MT 59840

Bitterroot National Forest
Attn: Tami Sabol, Stevensville District Ranger
88 Main Street
Stevensville, MT 59870

Ravalli County Board of Commissioners:
Commissioner Jeff Burrows, Commissioner Greg Chilcott, Commissioner Ray Hawk,
Commissioner Doug Schallenberger, Commissioner Chris Hoffman

Ravalli County Collaborative members:

Kris Bayer, Larry Bright, Jeff Burrows, Greg Chilcott, Marc Cooke, Rod Daniel, Jeff Duus, Margaret Gorski, Tom Henderson, Skyler Hoefer, Larry Jakub, Kelsey Miner, Steve Schmidt, Dusty Weber and Fred Weisbecker