

Objection comments on Gold Butterfly project, located on Stevensville ranger district, Bitterroot National Forest

Responsible official: Supervisor Matt Anderson

Introduction and ISSUE #1: COLLABORATION

I am writing this official objection as I believe my previous comments during scoping and on the DEIS were insufficiently addressed in the FEIS. Also, there are project treatment changes outlined in the Draft Record of Decision (DROD) that need to be addressed and show that inadequate analysis was carried out and impacts not disclosed from the changes proposed, suggesting they are arbitrary and capricious. Gold Butterfly (GB) is the largest project in many years on the Bitterroot National Forest (BNF). While it proposes some positive actions and addresses some forest needs it is very controversial and viewed negatively by a large majority of official commenters to date on a range of issues. The core issues of concern relate to logging old growth (OG), constructing many miles of new roads, and its negative impacts on wildlife, habitat, and water quality. No project in decades has proposed logging hundreds of acres of OG or building/reconstructing over 40 miles of roads. It is because of these controversial and damaging intentions that the public overwhelmingly provided comments and recommendations that led to the “no new roads, no treatment in OG” Alternative 3.

But make no mistake: Alternative 3 was deliberately manipulated to misrepresent what the public wanted regarding road construction and OG. The public wanted no new road construction. By including 16.5 miles of undetermined/ghost road reconstruction in Alt 3, the BNF perverted the public's comments and priorities. Likewise the public repeatedly requested light handed OG treatments (e.g. prescribed burning, non-commercial thinning); they did not ask for no treatment whatsoever. In emails that were obtained through FOIA FS personnel including then Stevensville District Ranger Sabol chose the “no treatment in OG” to create a more stark contrast between the 2 Action alternatives. It did not represent what the public wanted. This was a blow to honest attempts at collaboration by the participating public with the FS.

Despite this deliberate “poison pill” Alt 3 achieved the project's Purpose and Need. It was an opportunity to galvanize a divided community and find common ground among the 2 forest collaboratives, the timber industry, conservationists, and the public-at-large. This certainly has not happened on the Bitterroot in the last 40 or more years; maybe never. While the FS touts “collaboration” and the BNF's new leadership is asking for a project founded on collaboration (GB could have been one, based on common issues of OG, roads, wildlife, water) the end result as seen in the selected Modified Alternative 2 simply shows the collaborative process as just a box to be “checked off.” The engaged citizenry worked incredibly hard and were thoughtful; the agency just went through the motions and not getting the collaborative outcome it wanted, they ignored it.

As a member of the Bitterroot Restoration Committee (BRC)—but not speaking for the collaborative in this Objection—we have been discussing and visiting the Butterfly area and project iterations for about 10 years, far longer than the new-ish Project Leader, the multiple Stevi district rangers, and the new Forest Supervisor. The BRC repeatedly raised concerns about OG, roads, water quality, wildlife, habitat, and the reopening of Butterfly Creek Road 13111. Our concerns were communicated to FS personnel over the years and Modified Alternative 2 did not nearly adequately address those concerns. The selected alternative is in no large, medium, or even small way aligned with the public, the collaboratives, or the alternative workshop results. Negligible changes were made to the original Alternative 2. What were these changes and why they were they made lead me to issue #2.

ISSUE 2: OLD GROWTH

OG regeneration units were changed to commercial intermediate cuts (Units

17,18,23a,24a,25a,25b,25c,28,30a,30b,30c,30d,53,58a) and non-commercial intermediate with DBH limits (Units 13b and 93). The BRC was told on 7/22/2019 by GB Project Leader Jeff Shearer that the changes were recommended and made by silviculturist Hartless and biologist Lockman to “move the needle” a little towards public views on OG. This is untrue. Email dated 2/19/2019 from Hartless to District Ranger Sabol (obtained through a FOIA) explicitly describes what modifications silviculturist Hartless was recommending in the relevant units so as to meet the project’s Purpose and Need and retain OG characteristics. It is very different from what materialized in the selected Modified Alternative 2.

So who made the changes and why? I do not know. Jeff Shearer was asked if HFRA constraints/requirements forced the change of regen units so that various stands would not lose OG status, which seems prohibited under projects utilizing HFRA. Mr. Shearer said this wasn’t the case. I still question if HFRA limits what veg treatments can occur in OG and if Modified Alt 2 still violates HFRA. Here’s what we do know about the veg treatment changes in OG: The FEIS does NOT DISCLOSE the IMPACTS of changing treatment from regen to commercial or non-commercial intermediate treatment. This significant change was not analyzed.

We also know that the project’s silviculturist recommended a very different modification to these regen units as seen in the above-noted email. Hartless’ modifications received a diameter cap of 16” in units 17,18,24a,25a,25b,25d,30a/b/c/d, and 53. Having a diameter cap would certainly have met or likely exceeded OG requirements, while importantly achieving the Purpose and Need.

As it is in selected Modified Alternative 2 there is much less of a guarantee that OG status will be maintained as declared in the DROD. Why? Because units under intermediate harvest will likely be taken down to the bare minimum of 8 trees/acre (TPA) using a DBH>21”. BUT they will not be bored so there is no guarantee they will satisfy the greater than or equal to 170 year age requirement to qualify as OG. Without verifying age through coring the BNF cannot guarantee OG status will be maintained. Additionally, with the veg treatment change the Purpose and Need may not be met in those units to any significant degree.

Regarding DROD language on page 3 for converting Unit 13b from regen to non-commercial intermediate 7” DBH limit: The description is simply inaccurate. Unit 13b is dominated by Douglas-fir with widespread mistletoe. Ponderosa pine is a small component. Here again the FEIS does not disclose the impacts of changing the veg treatment. The FS will likely be perpetuating the mistletoe and making it difficult to reforest the unit with ponderosa. Analysis is lacking.

Old growth on the BNF will be materially less after this project. Current estimates on the Forest for OG is 12-13%; the Sapphires ~10%. The 2006 Forest Plan Revision document put a 15-20% Forest-wide desired condition goal. This project moves us away not towards that desired condition. Historical estimates put OG at 30-50%. If the FS is always citing historical norms like species composition to justify particular treatments, then why are we logging vast amounts of OG and moving the forest farther and farther away from historical norms?

Over 10 miles (10.24) of temp (6.59) and spec/permanent (3.65) are proposed through units containing OG, with proposed permanent roads going through at least 9 units of OG. Additional miles of roads will be constructed or “reconstructed” through OG via reopening of vegetatively reclaimed undetermined roads. Permanent roads are proposed through OG to reach adjacent areas that are harvest units. In sum, there is a large amount of road building or road reconstruction through OG. This will both directly and indirectly—in a significant way—affect OG conditions, OG-associated species, and obviously OG habitat—contradicting the DROD statement that no road construction or undetermined road reconstruction will significantly affect in a direct or indirect way any resource.

University of Montana Forestry Professor Andrew Larson, both in his own forest restoration research (Individuals, Clumps, and Openings—“ICO” management approach) and as co-author in the 2015 Hessburg research article (please refer to BRC citation) recommends retaining and expanding on existing

relic trees, old forest, and post disturbance large snags and down logs in dry pine and dry to mesic mixed-conifer forest landscapes. The BRC has recommended to the BNF in its GB Objection comments that restoration principles and management strategies as outlined by Larson and Hessburg be applied to GB. I concur. And an essential part of this is not logging “large, old trees that provide a critical backbone” to the forest types described above and prevalent in the GB project area.

ISSUE 3: ROADS

Our forest roads are deteriorating as I write this. In the 20 years living here I’ve witnessed many popular roads degrade from pleasant and passable, low clearance routes to compulsory high clearance roads. Roads affect everything whether negatively (sediment into streams) or positively (public access to recreate). The BNF is not complying with its Forest Plan Standards—specifically J1 and J2. Our road transportation system is unaffordable and unsustainable. It probably causes more harm than anything else on the forest. Yet GB proposes 40.2 miles of new road construction (6.4 m of spec, 17.3 m of temp) and ghost road reconstruction (16.5m). Per the FEIS only 0.9 m of the 22.3 miles proposed road decommissioning requires any treatment on the ground. So you have a 40:1 ratio of ground-disturbing road construction versus true road decommissioning. It’s completely out of balance and out of sync with what the public wants, what the agency can afford, and what the ecosystem can tolerate. The assertion that 40.2 miles of road construction/reconstruction “was not determined to present a significant direct or indirect effect to any resource area” is not a serious statement or an accurate one. These 40.2 miles will assuredly and significantly fragment habitat, disrupt and displace wildlife, spread invasive weeds, increase sedimentation into streams, and more. Proposed design features are inadequate to handle this level of road building and disturbance.

The fact that the project requires a FP amendment for EHE regardless of additional road building is case in point, and will only exacerbate EHE compliance. The vision and goal in the 2006 FP Revision was reducing the road transportation footprint, not increasing it. The agency is spending hundreds of thousands of dollars of our taxpayer money to build or reconstruct these new roads, to the detriment of many resources, and in no small, insignificant way.

As a longtime member of the BRC I believe in restoration principle #13: “Establish and maintain a safe road and trail system that is ecologically sustainable.” The proposed road construction in GB is counter to this principle. Likewise, Hessburg and his coauthors (including multiple Missoula-based researchers) recommend that “forest management activities should avoid the development of additional permanent road networks, staying away from especially sensitive areas.”

Adding to an unmanageable forest road system will lower the landscape’s resilience to climate change effects such as severe rain events. This puts public access and safety at risk, adds to taxpayer expense, and will cause unnecessary ecological harm, adding difficulty for species to move and disperse as the climate changes.

An example of road plans that make no sense to me: In the FEIS appendix, map #4 for Alternative 2, there is a road in units 46, 47 that is a proposed temp road that connects undetermined road segments—the whole thing proposed for storage afterwards. I thought temp roads will be decommissioned post project? Why is this temp road to be stored? Is it temp or permanent?

A concern I have brought up in past GB comments that’s only become more problematic as I learn of FS road plans is FR13111, running adjacent to Butterfly Creek. It is a closed road that’s become a de facto trail of high recreation value and use. I now understand that a road excavator machine will be driven on it in addition to full sized vehicles for various uses. When the BRC looked at a much smaller (few hundred acres) project about 10 years ago our committee had strong reservations about reopening FR13111 to any traffic being so close to the creek. Indeed BNF hydrologist Ed Snook wrote an overview of the project including natural resource implications. He made the determination that “Use of this access would trigger ESA consultation, create aquatic impacts and add complexity to project.” (See

reference—Snook-“Butterfly Creek Ponderosa Pine Restoration Project”) Even with suggested mitigation sediment would not be eliminated per Mr. Snook.

SUMMARY

Over 3/4 of official public commenters on GB requested the BNF choose Alternative 3 or a variation on Alt 3. What made—and still makes—GB an unpopular project?

—New roads, logging OG, impacts on wildlife, and water concerns. These were the top 4 issues. Of official commenters who specifically raised these 4 issues the percentage with a negative project view were 96%, 90%, 92%, and 87%, respectively.

The same issues were raised again and again by the 2 collaboratives, alternative workshop attendees, and the public-at-large. It’s no surprise: Old growth logging and more road building are not just unpopular but ecologically harmful. The public gets it. The agency has a near perfect overarching “mitigation/design feature” opportunity: Go back and choose Alternative 3 and modify it to decommission all undetermined roads and allow treatments in OG that preserve large, old trees. By doing so the BNF will have a project that achieves the Purpose and Need and one the whole community can support—a first in decades.

Van P. Keele

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