

Jeff Lonn's Objection, Gold Butterfly Project, Bitterroot National Forest
Matt Anderson, responsible official

My objection follows the order of issues raised in my submitted scoping comments of July 5, 2017, and my alternative workshop comments of . My scoping comments are italicized in quotes, followed by my related objection.

1. Size of the project. *"The Gold Butterfly project is too large to be analyzed as a single project. Science, peoples' values, and economics all evolve over time, and the project should be scheduled to account for these changes. Breaking it up into several projects to be analyzed separately and sequentially would help this forest health project evolve to meet changing goals This is the largest proposed project on Bitterroot National Forest. **Please include in the EIS the rational for proposing the largest BNF timber project in decades.**"*

There was no discussion of this in the FEIS.

2. Need for action: Improve landscape resilience to disturbances such as disease, insects, and fire.

*"Aren't road building and logging also disturbances? But unlike disease, insects, and fire, they are unnatural and do not provide the same level of ecological benefit. Disease, insects, and fire can all be viewed as agents of biological diversity (van der Kamp, 1991; Six et al., 2014), and they are only damaging if some management purpose such as timber harvest has been frustrated. Disturbances that reduce timber production are damaging in commercial forests in which timber production is the major goal, but these disturbances may be beneficial if other goals such as true ecosystem health are considered. For example, the mountain pine beetle naturally thins forests, selects for the more resilient trees, creates the opportunity for more biological diversity, increases vigor of remaining trees (Heath and Alfro, 1990), and leaves a forest that is less prone to severe wildfire than unaffected forests (Meigs et al., 2015, 2016). **In the EIS, please provide recent references justifying your need to improve landscape resilience to disturbances such as disease, insects, and fire, and supporting your treatment methods to do so.**"*

The majority of treatment areas are **not** MA 1 (timber priority), and so should be managed to consider other values. You did not provide any recent references justifying your need to improve resilience or supporting your treatment methods. You only gave responses to the references I cited. You fail to show that best available science has been used as required by NEPA and HFRA.

3. Need for action: Reduce chronic sediment sources in Willow Creek and Burnt Fork watersheds to improve water quality and bull trout habitat in the long term.

*"According to the BNF fisheries biologist on the June 28, 2017, field trip, the roads are the biggest sediment sources to these drainages. **So, how is building 40 miles of new roads and running endless logging traffic going to improve water quality?** Roads also fragment habitat. I understand that there are already 147 miles of roads within the project area. **In the EIS, please explain why the timber harvest cannot be done using only existing roads.** The recent debris flow and other erosion that closed the Willow Creek Road appear to have resulted from failure to use best management practices in road construction and maintenance. The 1987 Forest Plan states: **"roads will be closed to public use if adequate road maintenance funds are not available"** (p. II-27). **Why was this not done for the Willow Creek Road prior to the debris flow? Please explain how you***

plan to fund road maintenance in the future. Also explain how this plan will differ from the inadequate plans of the past decade.”

The questions posed in bold above were inadequately answered in the FEIS, or not answered at all.

4. The proposed action: Harvest, thin, and prescribe burn units with mountain pine beetle, dwarf mistletoe, Douglas fir beetle, western Spruce budworm, especially in the WUI: *“I assume this is justified to reduce wildfire risk to homes in the WUI. However, studies such as Reinhardt et al. (2008) show that thinning of the adjacent forest will do little to protect residences. Whether or not a building burns is almost entirely determined by the flammability of the building and the fuel treatment within a few hundred feet of the building, not by the flammability of the adjoining wildlands. In fact, a comprehensive review of fire studies (Bradley et al., 2016) suggests that forest management (logging) results in more severe fires.*

*With respect to pine beetles, the 2016 Montana DNRC Forest Health Aerial Survey (2017) shows MPB activity to be waning, with only a few scattered low-severity areas of activity in the area of the Gold Butterfly project. Another comprehensive review (Six et al., 2014) questions whether thinning has any effect at all on beetle epidemics. Other studies (Kulakowski and Jarvis, 2011; Hart et al., 2014; Meigs et al., 2015, 2016) conclude that beetle-killed forests are not likely to burn more severely or more frequently than unaffected forests. Finally, the beneficial effects of disease and insects have already been discussed above, and were also explored by Six et al. (2014) and Heath and Alfro (1990). Therefore, some recent science calls into question many of your treatments when assessed with true forest health, and not just timber production, in mind. Many of the treatments you propose appear to be taken from the badly outdated 1987 Forest Plan, and are not updated to reflect new science. **In your EIS, please provide recent references justifying the need to treat units of mistletoe, mountain pine beetle, Douglas Fir beetle, and Spruce budworm. Please provide recent references demonstrating that commercial harvest and thinning are effective means of reducing these insects and diseases.”***

You fail to show that best available science has been used as is required by NEPA and HFRA. You provide no recent references that demonstrate that your treatments will be effective. In addition, the project is both downwind and uphill of all nearby residences. Has there ever been a home lost to wildfire on the east side of the Bitterroot Valley?

5. New roads to be constructed. *“The detrimental effects on water quality in bull trout habitat are discussed above. BNF already has over 2000 miles of logging roads. Do we really need more? The 1987 Forest Plan projected only 21 miles of new local road construction for the decade 2016-2026 (p. II-7). **Does this mean the Gold-Butterfly’s will be the only new roads built in BNF this decade? But wait, the Westside project is already going to add 8 more miles of roads in 2017. The new roads will encourage more illegal motorized use, which is already a problem in this area. And with inadequate law enforcement, how do you intend to prevent this?***

You did not answer my questions. And you fail to show that adequate road maintenance will be performed after completion of the project.

6. Collaboration.

Collaboration is required by both NEPA and HFRA. You say you selected alternative 2 “because it aligns with suggestions from the IDT team” (not listed by NEPA and HFRA as potential collaborators), “the Bitterroot Restoration Committee” (as a member I know this is untrue—the BRC submitted their own objection), “members of the public” (they supported alternative 3 or a modification of alternative 3), “and community interests” (the alternative workshop participants selected alternative 3 or a modified alternative 3. This statement is just plain false. Alternative 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. But 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.

Also, you stated that Old Growth treatments were modified in response to public comment. But HFRA, Sec 102 (2) states: *“PROJECT REQUIREMENTS – In carrying out a covered project, the Secretary shall fully maintain, or contribute toward the restoration of, the structure and composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type, taking into account the contribution of the stand to landscape fire adaptation and watershed health, and retaining the large trees contributing to old growth structure.”* This suggests that the clearcutting treatment of old growth was changed because it violated the law, and had nothing to do with collaboration.

7. Old growth. *“Inventory and then preserve all old growth, including individual old trees and stands that may not necessarily qualify as “old growth stands”. Commercial logging in these areas should be prohibited, not only to preserve the rare old trees, but also to maintain soil quality to retain native plants, keep weeds from invading, and preserve old-growth-dependent wildlife.*

Although you have backed off clearcutting the old growth, you are still building miles of roads through old growth and commercially logging old growth, taking it down to the minimum criteria established by Green et al 1992. Green et al (1992) surveyed 4,847 plots of Western Montana Zone 1 Ponderosa-Doug Fir-Western Larch old growth and found that they averaged 17 old growth trees per acre, well above the minimum 8 you are leaving, an average basal area of 161 ft², well above your prescription, and 6 snags per acre, which will probably be cut for firewood with the new road access. Your prescription is not the ecologically supported one, and is not supported by best available science.

Finally, I will repeat my comments submitted to the Gold Butterfly Alternative Workshop Meeting below:

Manage the forest for the public good rather than for the benefit of the timber industry. There are many places in the U.S. that can produce commercial timber, but few places that offer the beauty, unspoiled character, and intact ecosystems of the Bitterroot. With western Montana’s ever-expanding human population, BNF is increasingly valued for its preservation of wildlands and wildlife habitat, for

its role in carbon sequestration, for recreational activities, and for its contribution to the local economy by making Ravalli County an attractive place to live. At the same time, it is becoming less valued for its contributions to a dying timber industry, whose needs can easily be fulfilled elsewhere. BNF should be managed for the years 2018 and beyond, not for 1987 values (date of the last Forest Plan). However, the commercial logging and road building along the Coyote Coulee trail in the Westside project showed that you place the profits of your corporate partners above all else, and I have little hope that you will ever embrace these other important values.