

Gold Butterfly Objection

Michelle Long


Objections related to:

Gold Butterfly Project

Bitterroot National Forest

Responsible Official – Matt Anderson, Forest Supervisor

Located on the east side of the Bitterroot Valley between Burnt Fork and St. Clair Creek encompassing ~55,147 acres

I am submitting this objection because I disagree with this statement on page 5 of the DROD: “I selected Alternative 2, as modified, because it aligns with the suggestions from the Bitterroot National Forest Interdisciplinary Team (IDT), the Ravalli County Collaborative, the Bitterroot Restoration Committee, members of the public, and the community interests as gauged through the scoping and collaborative process.” The slight modifications to Alternative 2 certainly do not significantly address the concerns of the collaboratives and the public.

My prior written comments express concern about the size of the project, the number of roads to be built, the disturbance to wildlife, and the logging of old-growth trees.

Comments submitted July 6, 2018

As a resident of the Bitterroot Valley, on the Sapphire side, I am writing to express strong support for the Butterfly Project’s Modified Alternative 3. This plan better addresses the concerns raised by the public over logging projects. I love the habitats in the Sapphire side of the valley, and I want less land treated and fewer roads built. The Forest Service is well aware of the damage caused by road building and roads themselves, to streams and to wildlife. I worked on the Wolverine Watchers project and am very concerned that the roads will disturb this special animal, as well as other uncommon and common animals. Furthermore, I strongly object to logging of old-growth trees. These giants are key elements in their habitats and sequester large amounts of carbon dioxide. Please choose Modified Alternative 3.

The size of the project: Both Alternative 2 and the chosen Modified Alternative 2 treat the same number of acres. The DROD does not really address the problems that could be caused by such a large project, the largest in decades.

Concerns I (and many others) expressed are magnified due to the size of the project. Alternative 3 would treat far fewer acres and therefore require fewer roads, cause less habitat damage, and require fewer log truck trips. The slight change in the number of log truck trips due to the modification of Alternative 2 is insignificant (200-300 out of 12,000+).

Roads: I find the statement, “Road construction was not determined to present a significant direct or indirect effect to any resource area” to be a bit ridiculous, even a little offensive, in part because I don’t see sufficient evidence or reasoning supporting it. It defies logic that all the roadwork planned for the project will not spread weeds, fragment habitat, disturb wildlife, and increase sediment into streams. If the FS will not decrease the extent of construction and reopening of roads, then I would like to see more justification for the finding of no impact.

Old-growth: The chosen alternative for this project includes much road work in OG areas. Certainly this work will alter the OG habitat, which is key to the forest ecosystem. These roads in OG are among those that certainly belie the assertion that road construction and reopening of roads will not have a significant impact. Further, the proposed logging in OG decreases the percentage of OG in 3rd order drainages.

I am sure that the FS is familiar with the work of Larson and Hessburg (cited by the Bitterroot Restoration Committee in its objection). I ask that the FS modify the plan for OG to move it closer to the forests described by this research.

Wildlife: There is very little in the FEIS section purportedly *on* wildlife *about* wildlife. The section reads more like a discussion of OG in general. There is a paragraph about pileated woodpeckers and one on pine marten. Neither shows that those species are decreasing in the Gold Butterfly project area. They merely state that these species need OG. I would like to see more detailed analysis in the FEIS and discussion in the DROD of impacts on a wider range of wildlife., an analysis that focuses on the wildlife itself.

Lastly, I would like to comment on the impact of the FS choice of a slightly modified Alternative 2 on the relationship between the agency and the public, collaborative bodies, and other groups. At the Lolo and Bitterroot National Forests Stakeholder Forum in Lolo (April 2019), Matt Anderson, Forest Supervisor, expressed his desire to increase trust between the FS and stakeholders. The choice to implement Gold Butterfly Alternative 2 (with slight modifications) does not increase trust. Indeed, it has the opposite effect. As I said in the first paragraph of this objection, I don’t agree that the slight modifications bring Alternative 2 significantly closer to the desires of the public and collaboratives. I find the FS claim to be disingenuous. Further, based on emails released as a result of a FOIA request, Alternative 3 may have been

shaped not according to public and collaborative opinion but according to a desire to make more stark the difference between Alternatives 2 and 3 and thus make it easier for the FS to choose Alternative 2. I believe that FS behavior in regard to this project raises questions, even suspicions, about the agency's sincerity in consideration of public input and collaboration.

I ask that the FS reconsider its decision and modify Alternative 2 to actually bring it closer to the wishes of collaboratives and the public.