



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**August 9, 2021**

Ref: 8ORA-N

Matt Anderson, Forest Supervisor  
Bitterroot National Forest  
1801 North 1st Street  
Hamilton, Montana 59840

Dear Supervisor Anderson:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Gold Butterfly Project (CEQ No. 20210075) in the Bitterroot National Forest (BNF). In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and pursuant to Section 309 of the Clean Air Act (CAA), the EPA provides the following comments on the Draft SEIS.

On November 15, 2019, the USFS finalized the EIS and Record of Decision (ROD) for the Gold Butterfly Project. The Project encompasses 55,147 acres within the BNF and will conduct commercial and non-commercial vegetation treatments to forest stands to improve resilience to insects, disease, and wildfire, in addition to moving trailheads and managing roads to improve stream conditions. After the ROD was signed, it was determined a project-specific amendment (Amendment) to the 1987 Bitterroot Forest Plan was needed to address the management of old growth stands in the Project area. On August 28, 2020, the ROD was withdrawn. The purpose of this Draft SEIS is to assess the effects of adding the Amendment to the Bitterroot Forest Plan regarding old growth management.

Enclosed are our recommendations for improving clarity in the Final SEIS so that agencies and the public can better understand the action and its environmental effects. We appreciate the opportunity to participate in the review of this Draft SEIS. If you have any questions or comments, please contact me at (303) 312-6704, or Shannon Snyder of my staff at (303) 312-6335 or [snyder.shannon@epa.gov](mailto:snyder.shannon@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "P. S. Strobel", is positioned above the printed name of the signatory.

Philip S. Strobel  
Director, NEPA Branch  
Office of the Regional Administrator

## Enclosure – USFS Gold Butterfly Project Draft SEIS

### *Scope of Analysis*

The Forest Plan contains a Forest-wide Management Wildlife Resource Objective: “Maintain sufficient old-growth habitat on suitable timberland to support viable populations of old-growth dependent species.” The Draft SEIS limits the scope of its environmental consequences analysis to vegetation, the pileated woodpecker and pine marten. We realize these old growth indicator species are listed in the Forest Plan, but it is not clear whether there are other wildlife species that could be adversely or beneficially impacted by this proposal. We recommend the Final SEIS include a clearer description of the rationale for the scope of this analysis.

### *Incorporation by Reference*

The Draft SEIS states that under the proposed action, a project-specific amendment to the Bitterroot Forest Plan is needed to modify the criteria to consider when defining old growth. The new criteria would align with a scientific journal article, *Old-Growth Forest Types of the Northern Region* (Green et al. 1992 errata 2011), which is incorporated by reference in the Draft SEIS. The Draft SEIS notes this is the best available scientific information regarding old growth in the Northern Region. Management Areas 1, 2, and 3a in the Bitterroot Forest Plan each have a standard related to old growth stand size and for those areas, management area direction related to old growth will be modified for consistency with Green et al. Chapter 2 in the Draft SEIS describes the Preferred Alternative, comparing the old growth standards in the current Forest Plan to the proposed standards (pp. 8-9). Under the modified Forest-wide Wildlife and Fish Standards (p. 9), it states that “stand conditions that qualify as old growth will be determined by the criteria as outlined in Green et al. 1992, 2011. In particular, the old-growth forest type descriptions for the Western Montana Zone will apply.” In Green et al. there are eight different subcategories of old growth forest descriptions under the Western Montana Zone, each with their own minimum characteristics. Incorporating these standards by reference in the Draft SEIS made it difficult to review and compare the current forest-wide old growth standards to the modified forest-wide standards. To improve agency and public review of the action, and consistent with the CEQ regulations at 40 CFR § 1501.12, we recommend the Final SEIS include the modified forest-wide old growth standards from Green et al.

### *Old Growth Indicator Species*

Based on information in the Gold Butterfly EIS and Draft SEIS, it appears that between 1987 and 2018 there has been no monitoring for the pileated woodpecker or the pine marten per the Forest Plan requirement. The Forest Plan includes a Forest-wide Management Standard for Wildlife and Fish that requires: “The amount and distribution of old growth will be used to ensure sufficient habitat for the maintenance of viable populations of existing native and desirable vertebrate species, including two [old growth] indicator species, the pine marten and pileated woodpecker.” The Forest Plan also requires pileated woodpecker and pine marten populations will be monitored as indicators of old growth. The 2018 Gold Butterfly EIS analyzes the Project’s impact on the two old growth indicator species, focusing on habitat and noting that the Forest does not have population estimates for either of these species in the Project area. The Draft SEIS analysis concludes that the Amendment will not have any direct, indirect or cumulative effects on these two species. It also notes it will not affect the amount of habitat available for species such as pileated woodpeckers or marten because these species also occur in stands that do not meet old growth definitions. The focus of this effects analysis is on habitat, rather than population.

Without baseline population and trend estimates for the Project area, it is unclear how the Forest is evaluating whether the Forest's application of Green et al. since 1992 has resulted in old growth habitat sufficient to sustain populations of the Forest's indicator species, pileated woodpecker and pine marten. The EPA recommends the Final SEIS more clearly explain how impacts to these two species are being evaluated and discuss the limitations of the analysis. Additionally, we recommend the Final SEIS Record of Decision commit to conduct baseline indicator species population monitoring per the Forest Plan prior to initiating the Gold Butterfly Project. This monitoring will be needed Forest-wide before initiating the process to generate the next Forest Plan.