



January 14, 2022

Objection Reviewing Officer
Northern Region
Federal Building
Building 26
Fort Missoula Road
Missoula, MT 59804

Dear Reviewing Officer:

On behalf of Idaho Forest Group (IFG), thank you for the opportunity to provide support comments during the Objection Period for the Draft Record of Decision and Final Supplemental Environmental Impact Statement for the Gold Butterfly Project.

IFG is not writing to file and objection to this project, rather this is a letter of support for the Project to move forward, and some suggestions to make implementation better. IFG first commented on this Project in 2018, submitted an objection support letter in 2019, and finally commented on the Draft Supplemental Environmental Impact Statement concerning old growth in 2021. This project needs to be implemented because the area has a history of stand replacing wildfires and IFG believes this landscape is on borrowed time before the next fire becomes a reality.

Driving the urgency for treatment is the fact that the project area is about 55,147 acres with 6,600 acres in the Wildland Urban Interface and approximately 10,500 acres is designated as insect and disease treatment area under Section 602 of the Healthy Forest Restoration Act (HFRA). Insects and disease have reduced the overall health and productivity of the stands and currently they suffer from chronic Douglas-fir bark beetle, dwarf mistletoe, and western spruce budworm infestations and a recent mountain pine beetle outbreak.

The long process to get to this objection period began in 2017 with scoping and Issuance of the Draft EIS in 2018. In June 2019, the Final Environmental Impact Statement, its summary, and the Record of Decision for the Gold Butterfly Project were released to the public. An administrative review (objections) process was conducted at that time. An updated final environmental impact statement was published in the Federal Register on October 11, 2019. The Gold Butterfly Project Final Record of Decision was signed by Bitterroot National Forest Supervisor Matt Anderson on November 15, 2019, and with it an updated Final Environmental Impact Statement was released to the public.

After the Final Record of Decision was signed, it was determined a project-specific amendment to the Bitterroot Forest Plan was needed to align management of old growth stands in the project area with the best available scientific information. On August 28, 2020, the Forest Supervisor withdrew the Final Record of Decision for the project with a letter directing forest personnel to conduct additional review and analysis regarding the needed amendment.

The Forest Plan Amendment was needed to provide a better definition of old growth for the Forest and to update the criteria that defines and measures old growth vegetation. Green et al is the Northern Region's best available scientific information to identify old growth because it contains measurable criteria to consistently define old growth based on a national definition that old growth forests are distinguished by old trees and related structural attributes. The old growth definitions are specific to forest type and habitat type group. IFG submitted comments to this Amendment on Draft Supplemental Environmental Impact Statement in 2021.

As we noted in our comment letter submitted in 2018, we fully support the Purpose and Need of this project:

"The purposes of the project are to 1) improve landscape resilience to disturbances (such as insects, diseases, and fire) by modifying forest structure and composition, and fuels, 2) provide timber products and related jobs, 3) reduce chronic sediment sources in the Willow Creek watershed to improve water quality and bull trout habitat in the long-term, and 4) restore or improve key habitats such as meadows, aspen, and whitebark pine. The project is located on the east side of the Bitterroot Valley between Burnt Fork and St. Clair Creek."

IFG fully supports Alternative 2: *"Under the proposed action, a project-specific amendment to the Bitterroot Forest Plan would be implemented to modify the criteria to consider when defining old growth. The criteria would align with Green et al. (1992 errata 2011) which is the best available scientific information regarding old growth in the Northern Region"*.

IFG fully supports the efforts of the Bitterroot National Forest to design and implement large landscape level projects. Thank you for the opportunity to provide support comments for the Gold Butterfly Project during the Objection Period. IFG would like to be involved in any objection resolution meetings that may be held.

Sincerely,

Angelo N. Ververis

Angelo Ververis
Forester
Idaho Forest Group
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