

Dear Objection Officer and Bitterroot National Forest,

I respectfully write once again in objection to the Gold Butterfly (GB) Project. In the years since the project was first proposed the problematic nature of some of the unpopular proposed treatments has only magnified. The public at large and the most involved (and most legitimate with a long history) local collaborative—the Bitterroot Forest Collaborative or BFC—were firmly opposed to the old growth (OG) logging and extensive road building that's contained within the GB Project.

There was an Alternative 3 that mostly addressed the unpopular and unwise OG logging and road building. The BFC's recommendations most closely matched this alternative. There was an opportunity for the BNF to develop a project under Alternative 3 guidelines that would have garnered support from the timber industry, most all the public, and likely even Friends of the Bitterroot. This would have been a first for a large-scale commercial logging project. It would have created good paying jobs and started to bridge the differences between industry, conservation, and the FS. This opportunity is still there. But to log swaths of OG, build dozens of miles of resource-damaging roads, and create multitudes of clearcuts will only exacerbate climate change impacts. It will further divide our community and lower trust in the FS and institutions. It will add to taxpayer burdens and negatively impact those homeowners who live along the one and only haul route.

The OG impact cannot be overstated: You will be logging THOUSANDS of large, old fire- and disease-resistant trees. These are legacy trees, growing here even BEFORE Lewis and Clark passed through. We need to be proud of these magnificent trees; protecting them, praising them, banking them for an uncertain future—not logging them through some ill conceived amendment loophole. Cutting OG trees is not popular to any political persuasion; it is universally opposed by the public; only a sliver of industrial logging folks support this. It is truly shameful.

Doing “intermediate cuts” will not guarantee you will maintain OG status. Will you be coring all the leave trees to ensure they meet OG age criteria? Of course not. Will you still have FUNCTIONAL old growth after cutting them to a minimum and driving heavy equipment throughout the stands, compacting soils and removing all the other OG characteristics that make old growth old growth? —Things like snags, leaners, down logs, understory plants? The public can only conclude that the old growth logging is only for \$\$\$\$\$. It is not for forest health.

Again, you still have the opportunity to change things.

While I mention the BFC and FOB—and I am members of both— I do not speak for them. I want the FS to please incorporate my previously submitted GB comments.

Furthermore:

Old growth standards should not be suspended. Do not reduce OG definition to 8 trees per acre. This is arbitrary and is not what Green et al intended. Nor does it ensure that the remaining trees will constitute functional OG. As you well know the Green et al plots on the BNF averaged 17 qualified OG trees per acre.

Rather, maintain or increase the Forest Plan OG % to be protected and maintained on the forest.

The new WUI definition in the community risk assessment is flawed: It is not backed by science or full public process. There are very few homes near the GB area. They are upwind and downhill from potential fire activity. This is not a high fire risk area.

The project area should be considered a "grizzlies may be present" area and the project should be modified accordingly.

In conclusion, scrap the current project proposal and use Alternative 3 as a template.

Van P. Keele

