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First name: Michele
Last name: Dieterich
Organization:
Title:
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Supervisor Matthew Anderson and Ranger Steve Brown
Bitterroot National Forest (BNF)
1801 North 1st St
Hamilton, MT 59840

Comments on Gold Butterfly Supplemental Environmental Impact Statement (SEIS)

Thank you for the opportunity to comment on the Gold Butterfly SEIS. I live near Hamilton and spend a lot of time in the Sapphires. The Sapphires provide incredible habitat for many animals including those that rely on mature and overmature forests and all that goes with them. I volunteered with the MPG ranch on a remote camera project and our station discovered a lactating female and later her offspring. This area is essential to wildlife including wolverine, fisher, grizzly bears and Canada Lynx. It is part of the wildlife corridor of the Rocky Mountains and it is irreplaceable.

The old growth in the area will not return in my lifetime or yours even if you are much younger. How awful to rely on a study that has never been peer reviewed, relies on science from 1992, and has never been subject to an independent scientific review process. If Green et al is truly the best available science, then demonstrate that with a full scientific review, and a full NEPA process to establish a change in our forest plan, the contract that you made with the public in 1987.

That you have used Green et al for 26 years hardly justifies its continued use, but that seems to be what the SEIS states. It also states that using Green et al will not change the amount of old growth identified in the project area because they have used Green et al to identify the old growth in the project area. The only way to take the hard look at the effects of the old growth amendment is to indentify old growth in the project area using Green et al and then identify old growth in the project area using the forest plan standards and compare them. Otherwise you are not analyzing the effects of using Green et al.

It is concerning that this has been going on for many years. All projects going back in time must be evaluated. What parts of Green et al did they use? Did they honor the 40 acre size in the forest plan? Did they honor the 15 trees per acre standard? Did they cut old growth to 8 trees minimum? It seems odd that you mention a recent project for monitoring the effects of treating old growth when past projects might be more pertinent. By the time you see the effects of Green management on the stands, it will be too late to make any changes in Gold Butterfly. Oddly enough the Como project seemed to honor 40 acre stands and recruited old growth in two of the smaller old growth stands by not cutting any trees 20 dbh. This is not planned in Gold Butterfly, so how will the monitoring in Como have anything to bare on the Gold Butterfly project activities?

What really needs to be done is to take a step back and research what has been done with old growth since the Forest Plan ROD and since the supposed use of Green et al and analyze those stands. The plan should not be to continue business as usual with an amendment to validate illegal procedures in the past that have broken the contract BNF made with the public.

You state that Green et al will preserve old growth, but will it? In the Buckhorn project a stand was identified as old growth (and would have been old growth by forest plan standards) but coring was done and the trees weren't old enough, so the stand was not treated as old growth. This stand was moving to old growth and was filled with large trees 21 dbh. Green et al recommends retaining large trees. Please explain this. The amendment you have

proposed is not quantifiable. The amendment says BNF will use the quantifiable and qualifiable attributes listed in Green et al. to identify and manage old growth. Green et al lists many attributes as part of old growth. Which will you use? If you use them all, you cannot cut any large trees or any dead or dying trees, yet, you say you can commercially log old growth as long as you do not take it out of old growth status. That would mean 8 trees per acre, that is considered a seed tree cut. I have never seen an old growth stand in the Bitterroot that had a mere 8 trees per football field. Green et al found Bitterroot old growth stands to have an average of 17 trees per acre. When you discuss the need to return to historical conditions, you should consider historical conditions of old growth as discovered by Green et al and Arno.

Green et al discusses decadence and uniqueness. Old growth structure includes dead and dying trees, dead top trees, downed logs 6 dbh and greater. It includes diseases like mistletoe. Proposed treatment of old growth in the project area is designed to remove mistletoe. Even though recent studies say that mistletoe actually feeds the forest. It is all connected, you cannot take age, size and cut old growth to those minimum numbers.

BNF explains that the forest plan does not take into account different forests and tree age. If you delve into the FEIS of the forest plan, you will find that they do consider age and different types of forests. They choose to use a dbh. This is an easier measurement than coring and not only does it protect old growth, it also protects trees and stands that are moving towards old growth, ready to replace the dead and dying stands.

40 acre stands are necessary for wildlife. Actually they need much larger stands that is why the forest plan asks that stands are considered as they move to other management areas and riparian areas so they are across the landscape. Without the 40 acre stand size, small islands of old growth will be saved, but they will be more vulnerable. Please analyze current patch size and edge research. It shows that small patches are much more vulnerable. It would be better to use the 40 acre stand size to recruit and create larger patches of old growth across the landscape.
The forest plan has a standard to retain all snags that do not propose a hazard. No snags in old growth are a hazard unless you wish to commercially log and run machines through these decadent, beautiful trees that have been around much longer than all of us. They have stood the test of time, but they will not survive the fellerbuncher.

The SEIS does not fully analyze the effects to wildlife and fisheries. Old growth and mature stands protect our water supplies, our fisheries and a host of wildlife. Fisher are seen here and there on the forest, a few were seen on remote cameras. They need old growth. Martens and pileated woodpeckers are your indicator species. They both rely on large trees regardless of age. The forest plan standard protects them. Green et al as it has been used (Buckhorn for example) does not. Lynx need habitat that provides hares. Those successional forests of large trees that would be protected by the forest plan benefit Lynx. Green et al does not.

Climate change is another factor to consider. Large trees store more carbon. When fires burn, and they will burn no matter how many trees you cut down, large trees will stand as carbon storing boles for up to 25 years after a stand replacing fire. When they finally fall, new regeneration has already taken over the carbon sequestration and the large boles become rich soil that also stores carbon. If you cut down the 130-year-old trees as you did in Buckhorn, about 12-18 percent become logs, the rest is burned (instant carbon release) or left on the cutting room floor. Those logs might last in a home for 50 years before the homeowner re-models or as seems to be the case these days, the house is razed to make way for a bigger better structure. Saw timber does not store carbon like a forest of large trees.

Lynx, wolverine and fisher not only need large trees, they need periphery especially in high drought conditions with fire eminent. Wildlife needs the chance to move from burning habitat to suitable unburned habitat. Project activities will make that difficult if not impossible.

And finally, grizzlies. This project will last for 15 years. We have grizzlies in Stevensville, we have had sightings

in the Burnt Fork. Jonkel, the local bear specialists is convinced that there are bears denning in the Sapphires as stated in a recent Ravalli Republic article. This project and the proposed amendment to old growth standards must be analyzed for grizzly bears. The programmatic bear assessment is already out of date. It will be to little too late when bears are discovered in the area. US Fish and Wildlife Service is planning a DNA search in the Sapphires. You cannot write of the possible presence of grizzly bears. The project are has excellent denning habitat, even some in cutting units. The area is an important avenue for connectivity. There are so many reasons to rethink the amendment as well as the project.

The management area percentages were created to protect old growth across the forest including areas suitable for timber management. It was known at the time that the percentages were higher than the existing old growth on the forest. What has BNF done to bring the forest up to standards in the past 30 years using either definition? This is a violation of the forest plan.

Do not break your contract to protect and recruit old growth in the Bitterroot. If you wish to change the definition of old growth, then do it the legal, ethical way and do a forest wide amendment with full NEPA and an independent scientific review. Don't change the forest plan one project at a time. You have used this for 26 years on project after project, you plan it for Mud Creek and the Bitterroot Front project. It is time to really look at the damage that has been done and work to reestablish public trust. Do a forest-wide amendment and work with the public to come up with measurable standards that protect the uniqueness of old growth, large carbon-storing trees, wildlife, fisheries, and our way of life in the Bitterroot.

Thanks for considering my comments.