COUNTY OF RAVALLI

STATE OF MONTANA

The Bitterroot Valley

Hamilton, Montana 59840

RAVALLI COUNTY COMMMISSIONERS
215 S. 4th Street, Suite A
Hamilton, MT. 59840
406-375-6500
commissioners@rc.mt.gov

January 13, 2022

Objection Reviewing Officer
Building 26 Fort Missoula Road
Missoula, MT 59804

RE: Ravalli County Objection on the Gold Butterfly Project

Dear Objection Reviewing Officer,

The Board of Ravalli County Commissioners (BCC) thanks the Forest Service for the collaborative efforts in developing the Gold Butterfly Project. We look forward to working with you to mitigate concerns/impacts addressed in this letter.

The Board's objections on the Gold Butterfly Project are as follow:

Purpose and Need

Below is the Forest Service stated purpose and need for the project.

1. Improve landscape resilience to disturbances (such as insects, diseases, fires) by modifying forest structure, composition and fuels
2. Provide timber product and related jobs
3. Reduce chronic sediment sources in Willow Creek and Burnt Fork on the Bitterroot River watersheds to improve water quality and bull trout habitat in the long-term.
4. Restore or improve key habitats, such as meadows, aspen and white bark pine.

The Ravalli County Commissioners support the purpose and need of the Gold Butterfly Project and while we feel there are project improvements that should be considered, overall the proposed actions achieve the purpose and need.

Ravalli County Roads

During the comment period for the Gold Butterfly Project, Ravalli County expressed concern over the impacts to county owned/maintained roads. Ravalli County objects to unmitigated impacts to county owned/maintained roads from heavy equipment and logging trucks, mostly, but not limited to, the impacts to Willow Creek Road. Due to resource and financial limitations, Ravalli County would not be able to accommodate the necessary maintenance during the project, nor the rehabilitation of the road after the project is complete. Ravalli County objects to shifting financial burden of the project to Ravalli County and believe it is contrary to current law and existing agreements.

We are requesting Forest Service commitment to maintaining Willow Creek Road during the project and a full reconstruction upon completion of the project.

Forest Management

Ravalli County supports responsible vegetation management (including commercial) in old growth stands that are affected by disease, bug infestation and over stocking. If fire were introduced in these stands under current conditions, it would result in a high mortality rate within the stand, including mortality of large, old growth trees. Ravalli County objects to converting the 14 units (17,18, 23a, 24a, 25a, 25b, 25c, 28, 30a, 30b, 30c, 30d, 53, 58a) proposed for regeneration harvest treatments in old growth to a commercial intermediate treatment. We object to converting units 13b and 93 from regeneration harvest to non-commercial treatments. We also object to converting units 11, 13b, 15a, 17, 18, 19a, 23b, 25a, 25b, 25c, 25d, 25e, 27, 30c, 30d, 35, 36a, 36b, 48a, 52, 53, 54, 56, 58a, 58b, 62b, 75, 76, 82, 93, 134a, 115a, 177a from harvest openings greater than 40 acres to less than 40 acres.

The decision documents acknowledges that these modifications will not be as effective.

Merchantable Timber Harvest Increase

Ravalli County supports project parameters that include increased volumes of merchantable timber with predictable and long-term sustainable harvest level commitment from the Bitterroot National Forest. Ravalli County submitted comments expressing support for increased commercial harvest for the Gold Butterfly Project. This commitment would provide the confidence level necessary for infrastructure investment from the private sector and create jobs and business opportunities. Converting the 16 units (17,18, 23a, 24a, 25a, 25b, 25c, 28, 30a, 30b, 30c, 30d, 53, 58a, 13b and 93) back to the original treatments and adding units 87 and 88 to the project would be beneficial to the harvest levels.

Ravalli County Natural Resource Policy

Ravalli County requested during the comment period that the Forest Service consider the "Ravalli County Natural Resource Policy" in your analysis and decision making process and object to proposed actions that are contrary to the Policy.

Conclusion

Please consider these objections as part of the official record for the Gold Butterfly Project. We look forward to being actively involved with this project's development and analysis.

Sincerely,

Ravalli County Board of Commissioners

Dan Huls, Chairman

Greg Chilcott, Vice-Chair

Jeff Burrows, Member