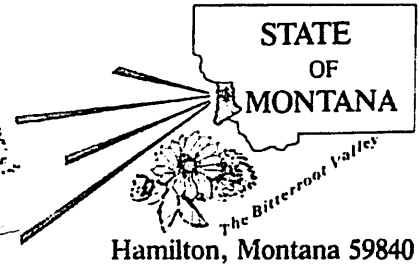
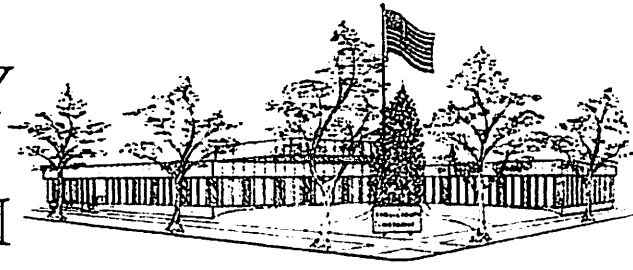


COUNTY
OF
RAVALLI



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

July 30, 2018

Tami Sabol
Stevensville Ranger District
88 Main St
Stevensville, MT 59870

RE: Ravalli County Comments on the Gold Butterfly Project

Dear Tami,

The Board of Ravalli County Commissioners (BCC) thanks you and Forest Supervisor Julie King for your 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 comments 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

Ravalli County is concerned about the 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. Concerns with the increased traffic associated with the project are:

- 1) Road impacts/deterioration of both gravel and paved sections of Willow Creek Road
- 2) Impacts/solutions to load rating on Willow Creek Bridge
- 3) Traffic safety for residents and recreationalists on Willow Creek Road
- 4) Health and safety of Corvallis students at the school and utilization of Willow Creek Road for access to and from school and for cross country/track team.
- 5) Dust emissions from increased traffic

Ravalli County requests a road maintenance agreement and project conditions that would mitigate impacts to the county financially and most importantly to the health, safety and welfare of the citizens.

Forest Management

Ravalli County supports active forest management within Ravalli County's jurisdictional boundaries. This management must be based on sound science and consider impacts to the local economy, cultural values and public health and safety. Forest management practices must include planting, thinning and harvesting of the forest vegetation. Removal of forest materials using mechanical and other harvesting systems will insure continued investment, employment and business opportunities in Ravalli County. We encourage a harvest level that results in a stable and sustainable volume of merchantable and non-merchantable materials being removed each year. The Bitterroot National Forest and the State of Montana Trust Lands have the capability under proactive management to achieve a healthy forest ecosystem while providing clean water, clean air, wildlife habitat, recreational opportunities, economic benefits and stability.

Ravalli County also encourages science based vegetation management (including commercial harvest) in the Inventoried Roadless Area (IRA). The scoping document proposed vegetation management units in the IRA and was then removed in the Draft Environmental Impact Statement (DEIS). We request including the units back into the scope of the project or be provided with the science based data supporting removal of these units from the project.

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.

Increased vegetation management will reduce the potential of catastrophic wildfire in the project area which impact wildlife, habitat, air and water quality, economy, and public health and safety.

We agree that our forests are in desperate need of proactive management to prevent catastrophic fires that sterilize the landscape, negatively affect water & air quality, destroy wildlife habitat, fisheries, view shed and our local economy.

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. This commitment would provide the confidence level necessary for infrastructure investment from the private sector and create jobs and business opportunities.

Ravalli County Natural Resource Policy

Ravalli County requests the Forest Service consider the “Ravalli County Natural Resource Policy” in your analysis and decision making process.

Conclusion

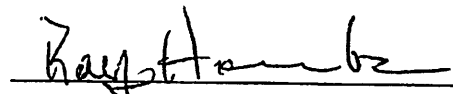
Please consider these comments as part of the official record for the Gold Butterfly Project. We look forward to being actively involved with this project’s development and analysis.

Sincerely,

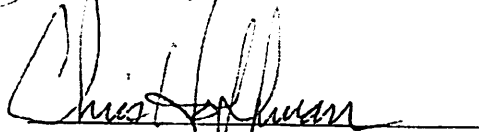
Ravalli County Board of Commissioners




Jeff Burrows, Chairman



Ray Hawk, Member



Chris Hoffman, Vice-Chair



Greg Chilcott, Member

Doug Schallenberger, Member