



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 8**

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March 13, 2023

Ref: 8ORA-N

Matt Anderson, Forest Supervisor  
Bitterroot National Forest  
1801 North 1st Street  
Hamilton, MT 59840

Dear Supervisor Anderson:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service Final Supplemental Environmental Impact Statement (SEIS) for the Gold Butterfly Project (CEQ No. 20230016) in the Bitterroot National Forest (BNF). In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and pursuant to Section 309 of the Clean Air Act (CAA), the EPA provides the following comments on the Final SEIS.

On November 15, 2019, the USFS finalized the EIS and Record of Decision (ROD) for the Gold Butterfly Project. The Project encompasses 55,147 acres within the BNF and will conduct commercial and non-commercial vegetation treatments to forest stands to improve resilience to insects, disease, and wildfire, in addition to moving trailheads and managing roads to improve stream conditions. After the ROD was signed, it was determined a project-specific amendment to the 1987 Bitterroot Forest Plan was needed to address the management of old growth stands in the Project area. On August 28, 2020, the ROD was withdrawn. The purpose of this Final SEIS is to assess the effects of adding the amendment to the Bitterroot Forest Plan regarding old growth management.

The EPA provided recommendations for the Draft SEIS in an August 9, 2021, letter that focused on improving clarity in the Final SEIS so that agencies and the public can better understand the action and its environmental effects. The EPA wishes to thank the Forest Service for their responses to our comments and the additional information that was included in the Final SEIS and the Agency Response to Comments. Incorporating the referenced forest-wide modified old growth standards into the Final SEIS, clarifying how the Forest considered the proposed action's impact to other wildlife species, and providing where the pileated woodpecker and pine martin monitoring information are available are valuable additions that improve the planning document quality. As it pertains to this proposed action, it would be helpful if the Forest would summarize the wildlife specialist report analysis and conclusions in the Final SEIS and make the connection between that analysis and the effects of this project-specific forest plan amendment. Also, given that it appears the pileated woodpecker and pine marten monitoring data are almost 10 years old, we continue to recommend Final SEIS ROD commit to conducting baseline indicator species population monitoring per the Forest Plan prior to initiating the Project. This monitoring information will also be needed Forest-wide before initiating the process to generate the next Forest Plan.

We appreciate the opportunity to participate in the review of this Final SEIS. If you have any questions or comments, please contact me at (303) 312-6155, or Shannon Snyder of my staff at (303) 312-6335 or [snyder.shannon@epa.gov](mailto:snyder.shannon@epa.gov).

Sincerely,

Melissa W. McCoy, Ph.D., J.D.  
Manager, NEPA Branch  
Office of the Regional Administrator