

Dear Beartooth Ranger District, Custer-Gallatin National Forest:

The Carbon County Resource Council (CCRC), as a local organization, is taking this opportunity to offer our comments on the proposed Burnt Mountain Project on the Beartooth Ranger District of the Custer-Gallatin National Forest. We appreciate this opportunity to comment on this project, and we fully expect these comments to receive full consideration before acceptance and adoption of these public land activities.

Public Notification, Collaboration and Involvement

- CCRC is concerned about the lack of public involvement and transparency for these proposed treatments of public lands. We feel public notification of the plan for the proposed project has been inadequate with the only public notice being a Forest Service email list or postcard sent to select individuals. For example, we have seen no announcement or description of the Project in the local or regional newspapers, and we are unaware of any public meeting to inform the local community of this treatment proposed for its backyard and viewshed. Section 603 of the Healthy Forests Recreation Act states that categorically excluded projects must be developed and implemented through a collaborative process including multiple interested parties representing diverse interests. This process must be both transparent and nonexclusive. CCRC requests documentation that the required Collaborative process for this Project has been fulfilled. The local interests of the Carbon County community have not been fully represented within the planning and design of this project. Representing diverse interests in Carbon County, CCRC asks how and when the required Collaborative will be implemented. CCRC members represent diverse interests within Carbon County, and we need to see a more collaborative and transparent approach to management of public lands, especially within National Forests. We believe the 30-day comment period is inadequate for the public to digest the project plans and to keep up with the changes that will inevitably occur. The short comment period shuts out the public from making meaningful and informed comments as the project evolves. CCRC requests that the public be kept apprised as the project evolves. We request that the public be notified of project changes as they occur and be given the opportunity to provide further comments on these changes.

Road Building Adjacent to the Palisades Trail and Impact on Recreation

- CCRC objects to the proposed roadbuilding and mechanized commercial treatment proposed for Treatment Units 27AT, 27T and 28T. These units are immediately adjacent to the Palisades Trail, one of the most popular year-round hiking and mountain-biking trails for local and visitor use in the Beartooth Ranger District. This road, although listed as temporary, will negatively impact the quality of this important and recreational and wildlife corridor/winter range to the public. Noncommercial thinning and/or prescribed fire without any road-building would be much more appropriate for these heavily used public

lands. It is important to note that an equally popular area trail, the Nichols Creek Trail, is going to also be negatively affected by road-building, clearcuts, and other mechanized commercial treatments. The cumulative effects of the categorically excluded Burnt Mountain Project and the Red Lodge Mountain Fuel Reduction Project will have detrimental impacts on area recreational opportunities for years to come. CCRC requests that noncommercial treatments and no road-building are more appropriate for this popular recreation area.

Recreation Opportunities and Scenery Objectives (Custer-Gallatin Land Management Plan)

- The Healthy Forest Restoration Act (HFRA), Sec. 603e and 605e - Forest Management Plans, require that all projects and activities shall be consistent with the land and resource management plans. The 2022 Custer-Gallatin Forest Management Plan Scenery Integrity Objectives states that management actions must remain visually subordinate to the scenic character of the area. The 2022 Forest Plan Standards (FW-STD-Scenery) 01 states that timber harvest units shall be shaped and blended with the natural terrain. In addition, the CG Forest Plan's Recreation Settings and Recreation Opportunity Spectrum (ROS), Desired Conditions (FW-DC-ROS) has identified the Palisades area as a Semi-Primitive Nonmotorized Setting (05) which must provide for a naturally appearing landscape free of motorized transport. Appendix A - Design Features- in the Burnt Mountain Project Overview does not address how the proposed treatments will be designed to meet those standards within and adjacent to this extremely popular and highly-used recreational resource. The proposed mechanized commercial thinning and road-building plan lack specificity in terms of what the management objectives are for tree density, forest structure, and forest composition and how those plans will maintain a fully forested visual aesthetic (see Commercial Thinning, pg. 6 under the proposed BM Project Overview.) We request that the USFS disclose the target tree density, forest structure and forest composition in this popular recreation area. For all of the above reasons, CCRC strongly advocates for noncommercial nonmechanized treatments in these treatment areas of the C-G Forest and abandonment of the plan to build any road accessing these treatment units. CCRC's requested changes as noted above will require additional time for Burnt Mountain Project planning design and public review and comment. We request that the decision-making process for this project be extended to accommodate the necessary planning design changes and public review and comment.

Noxious and Invasive Plant Species

- In the Burnt Mountain Project Overview document, the USFS has made the following direct statement about their plan to address non-native invasive species: "The amount of pre- and post- project weed monitoring, and treatment is dependent on funding, staff

resources, and partnerships. “The USFS makes no guarantee that there will be resources to address non-native invasive species introduced during the operation of the project. The agency has already had major funding cuts to management and research functions and losing even more funding and personnel is expected.

The FY 2026 Appropriations budget is significantly reducing the budget for Forest Service management and research. The USDA Forest Service reorganization plan is specifying significant reduction in FS staff. Given the future budget and staff reductions it appears the USFS will lack the budget and staff required to address the negative effects of proposed treatments including the presence and spread of invasive plant species and noxious weeds, the enforcement of road closures, the removal of temporary roads, monitoring soils and riparian zones for negative effects in addition to monitoring regeneration and restocking of affected stands. We request that the USFS assure the public that mitigation of these negative effects be certain to occur prior to the Burnt Mountain Project being finalized and implemented.

Roads Impacts

- The FS states that approximately 5.3 miles of new temporary roads would be built. The word “temporary” is a functional misnomer. Once land is disturbed its ecological integrity is permanently impacted. Even a closed road changes everything including - the hydrology, soil nutrients and carbon cycling. The FS can pronounce a temporary road “closed” for their administrative purposes but the landscape is altered, not able to return to its pre altered state and such roads open up a wide potential for continued illicit human activity, fragmentation and disturbance of wildlife habitat, soil disturbance, and the introduction of non-native invasive species. Add the 5.3 miles of new temporary road to the 5.2 miles of new temporary roads that will be built for the Red Lodge Mountain Fuels Reduction Project and suddenly there is an aggregate of 10.5 miles of new roading in the area. The FS has been successfully sued and lost over its claim that the agency can successfully close these “temporary” roads once they are opened. The USFS is the largest road manager in the world and with the continued loss of funding and personnel it can’t keep up with managing the current road system it has, much less building and managing additional miles of roads. CCRC requests that the USFS provide cost analysis for construction, mitigation and restoration for all new road construction on the Burnt Mountain project and disclose how and if timber harvest receipts will cover the cost of this road building. Eliminating the commercial timber harvests would avoid the costs associated with these proposed roads as well as the environmental impacts.

Red Lodge Creek Area, Climate Effects and Commercial Clearcuts

- The Red Lodge Creek Area is a unique landscape mosaic of foothill and lower montane forest, aspen woodlands, mountain sagebrush, grassland, riparian and wetland plant communities. This diverse mosaic of plant communities provides habitat for a variety of animal and bird species, including important winter range for moose, deer and elk and

provides a unique recreation opportunity to explore and experience a natural appearing landscape. The 2022 Custer Gallatin Land Management correctly recognized these values within the Recreation Settings and Recreation Opportunity Spectrum (ROS) (page 90) and Scenery (page 103) sections.

Recreation Use Opportunities and Scenic Integrity

- The Recreation Opportunity Spectrum Summer Map (Appendix B, Maps) delineated the majority of the Red Lodge Creek area as ROS as semi-primitive non-motorized and semi-primitive motorized. Desired conditions are to provide opportunities for exploration and self-reliance in a naturally appearing landscape. While vegetation management may be present, it does not dominate the landscape or detract from the experience of visitors (FW-DC-ROS, 05 and 07). The Scenery Management Map (Appendix B Maps) identified Scenic Integrity Objectives for this area as moderate. That is scenic character of landscapes appears slightly altered but must remain visually subordinate to the scenic character (Table 19, page 104). Scenery management standard (FS-STD-SCENERY, 01 page 104) directs timber harvest units shall be shaped and blended with the natural terrain. The intensity of proposed timber harvest over 330 acres (stand clearcut, commercial thinning) within this small 1,900-acre landscape is not consistent with ROS and scenery management objectives of the Land Management Plan. Particularly concerning is the amount of commercial timber harvest proposed for 14 stands along FS Road 2141. The level of management activity and intensity will alter the landscape character, recreation experience and scenery within this unique landscape for years to come.

Wetlands and Riparian Areas

- Not all riparian area management zones and wetlands are delineated with associated treatment stands on the Proposed Action North Unit Map. Riparian areas and wetlands occur within or are associated with stands 19T, 23T, 26T, 9F, 15F, and 16F. Some of these units are identified for stand clearcut. The Land Management Plan, FW-STD-RMZ-01 outlines four categories of riparian and wetland zones. The project overview does not identify which categories of riparian and wetlands occur within the project area. Additionally, Category 3 only describes wetlands, fens and peatlands greater than one acre. Smaller, less than one acre, springs and seeps are also ecologically important. What specific modifications will be made to the units and proposed treatments to eliminate effects of timber harvest activities on these ecologically sensitive areas CCRC requests that all riparian and wetland zones, including springs and seeps, be identified and withdrawn from commercial treatment.

Tree Regeneration, Adapting to a New Climatic Regime

- CCRC questions the viability of clearcut and even-aged management as an appropriate forest management practice in today's changing climatic regime. Warmer summertime

temperatures are projected to continue throughout the remainder of the century. Average temperatures in the upper Yellowstone watershed have already warmed 2.0 degrees (F) for the period 1950 through 2018 and are expected to increase an additional 3 to 6 degrees (F) or more through the end of the century. Additional changes include more days with summer exceeding 90 degrees (F), less winter snowpack, early run-off and increased summer potential evapotranspiration rates. These will have an effect on available soil moisture. Soil moisture levels are expected to decrease by 23 percent mid-century and could be as high as 56 percent by the end of the century (See Greater Yellowstone Climate Assessment Past, Present, and Future Climate Change in Greater Yellowstone Watersheds, June 2021).

Recent studies evaluating effects of climate and stand replacing disturbance (fire and clearcuts) have concluded that growing season temperatures, increased soil surface temperatures, lower available soils moisture and higher potential evapotranspiration rates reduce tree recruitment following disturbance. Kemp and others (In; Climate will increasingly determine post-fire tree regeneration success in low-elevation forests, Northern Rockies, USA, 2019) concluded mean summer temperature was the most important factor in determining post-fire seedling density and under a warmer climate, expect post-fire tree regeneration in low-elevation forests to become increasingly unsuccessful.

Dobrowski and others (In; Forest structure and species traits mediate projected recruitment declines in western US tree species, 2015) suggested that disturbances resulting in the loss of forest canopy will amplify the effects of climate change on tree recruitment. Hansen and Turner (In; Origins of abrupt change? Postfire subalpine conifer regeneration declines nonlinearly with warming and drying, 2018) found reduction in establishment of lodgepole pine and Douglas-fir seedlings post-disturbance. Given the new realities of a warmer climate regime and potential effects on recruitment we question whether the stated rationale and objective for using clearcuts to create a single age class is achievable once these stands are opened and exposed to direct sunlight.

We also question the argument, citing Alexander (1986), that less damage is associated with clear cutting in lodgepole pine stands. In the same publication, Alexander points out windthrow susceptibility varies with soil and stand conditions. Lodgepole pine is less vulnerable to windthrow on deep well drained soils, on low to mid north and east facing slopes or slopes protected by higher ground. Soils in these stands appear to be deep and well drained and stands are on lower slopes. Commercial treatment stands within the Red Lodge Creek area appear to be in deep, well drained soils thus they are less subject to windthrow. For that reason, alternatives to clear cuts and even- aged stand treatments are appropriate in the Red Lodge Creek area. Alexander also states "Clearcutting has the greatest visual impact and individual-tree selection has the least" and selective individual tree cutting can be used to create vertical diversity and different size classes. CCRC requests to see management treatments (non-commercial thinning) which will retain large trees, allow existing shade tolerant tree species to increase and promote stands of mixed ages and sizes. Such a forest is consistent with Scenery

Management and Recreation Opportunity Spectrum objectives as outlined in the 2022 Custer Gallatin Land Management Plan and is consistent with HFRA 602 e, 603 b 1 A and 605 b 1 A to maximize retention of large trees.

Cumulative Effects

- CCRC objects to the Burnt Mountain Project for a significant number of reasons including its deleterious cumulative effects as it is paired with the Red Lodge Mountain Fuels Reduction Project. These cumulative effects extend beyond these National Forest Projects to adjacent state and private lands. The negative cumulative effects on recreation, wildlife habitat and winter range, soil and riparian area degradation, road building, and scenic integrity point to a lack of thoughtful landscape planning and design for both of these categorically excluded projects on public lands. CCRC strongly believes that the Forest Service has an obligation to inform the public about how these Projects along with adjacent state and private lands commercial treatments affect the totality of landscape effects across the Beartooth Front. (Section 603b (1)(C) and section 605b of Health Forest Restoration Act referring to the Collaborative process). CCRC requests that the Forest Service directly involve the public in the Burnt Mountain Project decision making process through the Collaborative process and robust public notification through news, social media and public hearings.

Conclusion

CCRC appreciates the opportunity to comment on the Burnt Mountain Project. Although we understand the need for fuels management, we have serious objections to the planning, design and public collaboration and input to this Project. We believe the Burnt Mountain Project needs further analysis and design to better align with the C-G Land Management Plan objectives for recreation, wildlife habitat, invasive plant species and scenery integrity. CCRC also believes this Project requires more transparency, collaboration and public involvement before the decision is finalized. This process is being unnecessarily hurried and will have a long-term negative effect on the landscape and communities adjacent to the Custer Gallatin National Forest. CCRC requests more public involvement and collaboration with local communities in the planning and design of this and future projects along the Beartooth Front.

Sincerely,

Karen Walmsley, Chair CCRC
-representing the Executive Committee and
membership of the Carbon County Resource Council

