



August 13, 2025

Mathew Jedra, Forest Supervisor
Custer-Gallatin National Forest
10 E. Babcock St.
Bozeman, MT 59715

Re: Cooke City Fuels and Forest Health Objection

Pursuant to 36 C.F.R. Part 218, the American Forest Resource Council (“AFRC”) files this objection to the proposed decision for Cooke City Fuels and Forest Health Project. The official responsible is Forest Supervisor Matt Jedra. The Cooke City Fuels and Forest Health Project occurs on the Custer-Gallatin National Forest.

Objector

American Forest Resource Council
700 NE Multnomah, Suite 320
Portland, OR 97232
(503) 222-9505

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, Nevada, and California. AFRC represents over 50 forest product businesses and forest landowners. AFRC’s mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. The Cooke City Fuels And Forest Health Project will, if properly implemented, benefit AFRC’s members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

Objector’s Designated Representative

Tom Partin
921 SW Cheltenham Street
Portland, Oregon 97239
503-704-4644
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700 N.E. Multnomah, Suite 320
Portland, Oregon 97232
Tel. (503) 222-9505 • Fax (503) 222-3255

Reasons for the Objection

1. The Draft Decision does not include the appropriate amount of commercial treatment acres to meet the project purpose and need.

The project purpose and need includes the following:

- The need to reduce hazardous fuels in the proximity of the Cooke City and Silver Gate communities to reduce the probability of adverse impacts on the communities when wildfires occur (FW-OBJ-FIRE-01 and FW-GDL-FIRE-02). This includes treatment in the utility powerline corridor, which is the sole source of power to the Cooke City and Silver Gate communities.
- The need to improve stand resilience to wildfires by retaining or increasing the proportion of fire-resistant species and modifying stand structure (FW-OBJ-FIRE-02 and FW-OBJ-FVEG-01).

AFRC strongly believes that neither of these Needs will be met by treating so few acres and not properly protecting the Wildland Urban Interface and other resources such as powerlines.

The Cooke City Project area is 19,331 acres. From that landscape the Forest initially planned to treat 288.4 acres commercially. However, in the Draft EA and Decision Notice those acreages were reduced to 241.5 acres. (See Tables Below).

Scoping Table

Table 1. Proposed action by treatment type

Method	Estimated Acres
Tractor (Ground Based) Harvest	288.4
Mechanical Fuels Treatment	3,180.5
Hand Fuels Treatment	224.1
Total Treatment Acres	3,693

Draft EA Table

Table 1. Proposed action by treatment type.

Method	Acres
Commercial Harvest	241.5
Mechanical Fuels Treatment	384.7
Non-mechanical Fuels Treatment	578.6
Whitebark pine Enhancement (Non-mechanical)	1344.2
Whitebark pine Enhancement (Mechanical)	669.2
Total Treatment Acres	3218.3

Further, the total acres being treated dropped by over 400 acres from scoping to the Draft Decision.

The Forest acknowledges that stands are in poor condition in the description of the stand resiliency section. *“The forested conditions of the Cooke City project area have the potential for high intensity wildfires due to the advanced age and high stand density of the forest. These high stand densities combined with the fire behavior of the predominantly spruce and lodgepole pine forests create the potential for large scale stand replacing fires throughout the area and most importantly in the wildland urban interface.”*

2. The District did not take precautions to provide adequate safe ingress and egress to private landowners, and did not protect other resources.

- AFRC strongly recommended that the District put in fuel breaks to allow for safe passage along main access routes into and out of the Project area. AFRC also noted that these fuel breaks would provide additional protection for powerlines, fences and other resources found in the project area.

The Forest acknowledged they have problems in these areas: *The current fuels conditions in the Cooke City project area present potential risk of fire impacts to the wildland urban interface (WUI), ingress and egress corridors.”*

3. The District chose not to enter more acres of Roadless Areas.

- In our scoping comments, AFRC commented that we support active forest management in the Inventoried Roadless Areas within the Project area. However, the Forest has chosen to only treat 1,224.9 acres down from 1,469 acres in the scoping document of the total 206,718 acres of Roadless Areas, or less than one percent. See table and map below:

Table 4. Summary of treatments in inventories roadless areas.

Treatment	Acres
Commercial Harvest	40.6
Mechanical Fuels	214.8
Non-mechanical Fuels	466.6
Whitebark Pine Enhancement Mechanical	73.4
Whitebark Pine Enhancement Non-mechanical	429.5
Total Acres	1224.9

AFRC asked the Forest to explore options for additional commercial treatment needs.. We believe the Forest is missing a big opportunity for not doing more commercial work. We would also like the Forest to examine the mechanical fuel treatment acres to see if more commercial units could be implemented in all of the Roadless Areas.

4. The Cooke City Fuels Project is uneconomical.

- AFRC remains very concerned about the economics of this project and how the noncommercial work will be funded. We included this in both our scoping and Draft EA comments. The Forest is only treating 241.5 acres commercially which will generate some retained receipts or K-V funds. This leaves over 3,000 acres to be treated in one form or another. AFRC questions the Forest as to where these funds will come from? Again, one solution is to increase the acres and volume of commercial timber to be removed. We did not get an adequate answer in the Decision.

Resolution Requested

We request that the District reconsider the level of commercial treatment acres in all portions of the project area, including Inventoried Roadless Areas, to meet the purpose and need and improve the project's overall economic viability. We also request consideration of fuel breaks to provide safe ingress and egress.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request a meeting with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held as soon as possible with all objectors present. AFRC believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, AFRC requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors in the course of the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Tom Partin, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph".

Travis Joseph
President